

PHA 5-Year and Annual Plan	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 4/30/2011
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Third Annual PHA Plan for Fiscal Year: 2012

NORWALK HOUSING AUTHORITY

Final Approved Plan: 12/31/2011

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1.0	PHA Information PHA Name: Norwalk Housing Authority PHA Type: <input type="checkbox"/> Small <input type="checkbox"/> High Performing <input checked="" type="checkbox"/> Standard <input type="checkbox"/> HCV (Section 8) PHA Fiscal Year Beginning: (MM/YYYY): 4/1/2012 PHA Code: CT002				
2.0	Inventory (based on ACC units at time of FY beginning in 1.0 above) Number of PH units: 853 Number of HCV units: 680 Number of State of Ct Units: 78 Number of Moderate Rehab HCV Units: 162 Number of Substantial Rehab HCV Units: 200				
3.0	Submission Type <input type="checkbox"/> 5-Year and Annual Plan <input checked="" type="checkbox"/> Annual Plan Only <input type="checkbox"/> 5-Year Plan Only				
4.0	PHA Consortia <input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below.)				
	Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Units in Each Program
	PHA 1:				PH HCV
	PHA 2:				
	PHA 3:				
5.0	5-Year Plan. Complete items 5.1 and 5.2 only at 5-Year Plan update.				
5.1	Mission. State the PHA's Mission for serving the needs of low-income, very low-income, and extremely low income families in the PHA's jurisdiction for the next five years: See Five Year Plan 2010-2014				
5.2	Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan. See Five Year Plan 2010-2014				

PHA Plan Element	Changed	Attached to this Plan	Only on File at the NHA
PHA Plan 2010-2014 5 Year Goals and Prior Progress	Yes	Attachment A	
Eligibility, Selection and Admissions Policies, including Deconcentration and	Yes	Attachment B	
Eligibility	No		√
Wait List Procedures.	No		√
Selection	No		√
Admissions Policies	Yes		
Deconcentration	No		√
Financial Resources	Yes	Attachment C	
Rent Determination			
Income Based Rents	No		√
Flat Rents	Yes	Attachment D	
Payment Standards (HCV)	Yes	Attachment E	
Minimum Rent	No		√
Operation and Management Utility Schedule	Yes	Attachment F	
Operation and Management NHA Charges	Yes	Attachment G	
Designated Housing for Elderly and Disabled Families	No		√
Community Service and Self-Sufficiency	Yes		√
Safety and Crime Prevention	No		√
RAB Members	Yes	Attachment H	
CFP Annual Statement and Open CFP	Yes	Attachment I	
CFP 5 Year Plan	Yes	Attachment J	
Housing Needs Analysis	No		√
Strategy for Addressing Needs	No		√
Substantial Deviation	No	Attachment K	
Civil Rights Certification	Yes	Attachment L	
Fiscal Year Audit	No		√
Asset Management	No		√
Other Information required by HUD			
Violence Against Women Act (VAWA)	Yes	Attachment M	
Grievance Procedure	Yes	Attachment N	
Pets	Yes	Attachment O	
FSS Program Design	Yes	Attachment P	

(b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions.

Copies of the PHA Plan may be obtained from the NHA Office at 24 ½ Monroe St, Norwalk CT 06854 and on line at <http://www.norwalkha.org>

7.0	<p>Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers. <i>Include statements related to these programs as applicable.</i></p> <ul style="list-style-type: none"> a. Using the award of Planning funds from HUD, the NHA intends to make an application for HOPE VI/Choice Neighborhoods funding for Washington Village in 2012 or 2013. It also intends to explore voluntary conversion, demolition and disposition and mixed financing and/or HOPE VI/Choice Neighborhoods and other funding opportunities for Roodner Court and Meadow Gardens. b. The NHA will continue and expand its self-sufficiency efforts through the FSS program and through its homeownership programs for public housing residents and for HCV participants through its current approved HCV homeownership program. It will make a formal request of the City of Norwalk to replenish the funds for the Norwalk Redevelopment Agency Down Payment Assistance program, which is critical for low income homeownership. c. The NHA will continue to examine the use of project based Section 8 both for redevelopment of existing public housing developments including Washington Village, Roodner Court and Meadow Garden and for other initiatives. d. The NHA will continue to improve the living environment for any properties it owns or manages by promoting smoke free buildings.
8.0	<p>Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable.</p>
8.1	<p>Capital Fund Program Annual Statement/Performance and Evaluation Report. As part of the PHA 5-Year and Annual Plan, annually complete and submit the <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i>, form HUD-50075.1, for each current and open CFP grant and CFFP financing.</p> <p style="text-align: center;"><i>See Attachment I – Separate Files</i></p>
8.2	<p>Capital Fund Program Five-Year Action Plan. As part of the submission of the Annual Plan, PHAs must complete and submit the <i>Capital Fund Program Five-Year Action Plan</i>, form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan.</p> <p style="text-align: center;"><i>See Attachment J – Separate Files</i></p>
8.3	<p>Capital Fund Financing Program (CFFP). <input type="checkbox"/> Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements.</p>

9.0	<p>Housing Needs. Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.</p> <p>No new data has become available at this time, which would cause the NHA to change its analysis of need prepared in 2010.</p>
9.1	
10.0	

11.0	<p>Required Submission for HUD Field Office Review. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. Note: Faxed copies of these documents will not be accepted by the Field Office.</p> <ul style="list-style-type: none"> (a) Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i> (which includes all certifications relating to Civil Rights) (b) Form HUD-50070, <i>Certification for a Drug-Free Workplace</i> (PHAs receiving CFP grants only) (c) Form HUD-50071, <i>Certification of Payments to Influence Federal Transactions</i> (PHAs receiving CFP grants only) (d) Form SF-LLL, <i>Disclosure of Lobbying Activities</i> (PHAs receiving CFP grants only) (e) Form SF-LLL-A, <i>Disclosure of Lobbying Activities Continuation Sheet</i> (PHAs receiving CFP grants only) (f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations. (g) Challenged Elements (h) Form HUD-50075.1, <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> (PHAs receiving CFP grants only) (i) Form HUD-50075.2, <i>Capital Fund Program Five-Year Action Plan</i> (PHAs receiving CFP grants only) <p style="text-align: center;"><i>See Attachment L</i></p>
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ATTACHMENTS:

#	Attachment/Document
A	2010-2014 Five Year Plan Goals & Progress for First Year 2010-2011
B	B1 Amendments to ACOP
	B2 HCV Administrative Plans
	B3 Federal Lease Revision
	B4 Enterprise Income Verification (EIV) Policy & Procedures
C	C1 Financial Resources
	C2 AMPs Budgets
D	Flat Rents Schedule

#	Attachment/Document
E	HCV Payment Standards (2 Tier)
F	Utility Schedule
G	Norwalk Housing Authority Charges
H	RAB List
I	CFP – Annual Statements & Open CFP
J	CFP – 5 Year Plan
K	Substantial Deviation and Substantial Amendment Policy
L	L1 Civil Rights Certification
	L2 Other Required Certifications [Attached Separately]
M	VAWA Policy
N	Grievance Procedure
O	Pet Policy
P	Family Self Sufficiency Program

Attachment A: 2010-2014 NHA Five Year Goals and Progress in Meeting Goals

Accomplishments April 1st 2011 through March 31st 2012 (including anticipated accomplishments through March 31st 2012)

Goal 1. Expand the supply of assisted housing

Strategies:

- a. Apply for additional rental vouchers when opportunities arise
- b. Create new public housing if an opportunity arises
- c. Leverage private along with other public funds to create additional housing opportunities
- d. Pursue improvements and expansion of Norwalk's Work Force zoning by-law in Norwalk's 5 Year Consolidated Plan
Pursue passage of linkage fees by-law in Norwalk's 5 Year Consolidated Plan

Outcomes Actual and Projected Through 3/31/2012:

1. Will make input to the Work Force regulations, proposing that such affordable housing should be located in low poverty census tracts when it is not an onsite component of a mixed income development and the minimum size for a project to be subject to the regulation revert back from 20 to its original 12 units.
2. Secured a HUD Planning grant for Choice Neighborhoods.
3. Apply for a Choice Neighborhood Implementation Grant if able to secure City sites on or before 4/1/2013.
4. Applied to HUD for Housing Choice Voucher for people with disabilities, but not awarded.

Goal 2. Improve the Quality of Assisted Housing

Strategies:

- a. Analyze what is required to become a HUD high performer under the new public housing assessment system and create an action plan for this
- b. Continue the high performance of the Housing Choice Voucher program
- c. Continue to create or enhance programs serving NHA clients
 - i. Applications for grants and loans
 - ii. Improve the information systems, reporting and actions in response to reports
- d. Where warranted, redevelop obsolete public housing
- e. Continue efforts to become a MTW agency
- f. Pursue energy efficiency improvements

Outcomes Actual and Projected Through 3/31/2012:

1. The Housing Authority of the City of Norwalk continued implementing its green grants from HUD and continues to identify additional green initiatives. The NHA has been working with public utilities that have been funding weatherization work at various locations including Washington Village, Colonial Village, Ludlow Village, Seaview, Leroy Downs and King Kennedy. It will continue these efforts and along with contractors such as Zero Draft and Competitive Resources Inc., will improve the condition of as using of our buildings as it can.
2. In conjunction with the Grants that Norwalk Housing Authority received to install Solar Panels for hot water creation at Leroy Downs, Senior Court and 20 West, the NHA is preparing an IPM (Integrated Pest Management) plan. This will be a multi-faceted approach which will help the NHA to combat and prevent pest infestation of all types, thereby improving the quality of living for these residents. Also, preparing a Green Maintenance Plan for these 3 sites.
3. The Housing Authority has received numerous complaints over the years about second hand smoke. As a result it has proposed a smoke free housing policy for all buildings.
4. Maintained High Performance rating under HUD's Section Eight Management Assessment Program (SEMAP) performance assessment
5. The NHA will implement Phase II of its Energy Services contract with Siemens Building Technologies that includes replacement of heating systems at 356 Main Ave., King Kennedy Homes and Chapel St. Replacement of steam traps at Washington Village. Meadow Gardens Learning Center boiler replacement, conversion from oil to gas heat at 36 Fairfield Ave. and weatherization at all Federal sites.

Goal 3. Increase Assisted Housing Choices

Strategies:

- a. Continue policies and procedures which enable voucher holders to move into better housing and better neighborhoods
- b. Continue homeownership programs for HCV participants
- c. Pursue ways to use project based vouchers to increase housing quality and choices

Outcomes Actual and Projected Through 3/31/2012:

1. There have been 6 new home ownership purchases since April 1, 2010.
2. To Increase Assisted Housing Choices & Deconcentration the NHA has continued the two tier Payment Standards program. From April 1, 2010 to August 31, 2011, the strategy has resulted in the following:
 - a. 52 families moved to upper tier (income) census tracts:
 - FSS participants 22%
 - Disabled 9%
 - Non elderly 98 %

- White 48%
 - Black 52%
 - Ethnicity break down – Hispanic 28%. Non-Hispanic 72%
 - Average age of participant 47 yrs.
- b. 15 families moved to lower tier (income) census tracts:
1. FSS participants 9 %
 2. Disabled 20%
 3. Non elderly 89%
 4. White 35%
 5. Black 65%
 6. Ethnicity break down – Hispanic 21%. Non-Hispanic 79%
 7. Average age of participant 49 yrs.

Since 2007, the overall outcomes of this policy have been as follows:

The increase of clients living in the higher census track from 2006 before we started the program vary 2010 is 15%.

The decrease of clients living in the lower census track for the same period is 20%.

Public Housing Deconcentration—

In the first two quarters of 2011 there were no deconcentration actions required. October 2010-June 2011- In the last quarter in 2010 there was one property that required deconcentration therefore skipping was implemented as per NHA policy.

Goal 4. Improve Quality of NHA Properties and the Neighborhoods they are in

Strategies:

- a. Continue deconcentration policies for public housing and for HCV
- b. Continue to improve external appearance of properties and grounds
- c. Continue to improve quality of building amenities and unit conditions
- d. Continue aggressive screening for admission, lease enforcement
- e. Work with the City of Norwalk to reduce crime in the neighborhoods and ameliorate negative neighborhood conditions
- f. Coordinate re-development of NHA properties with the City re-development plans and Plan of Conservation and Development where consistent with NHA goals.
- g. Continue strict lease enforcement

Outcomes Actual and Projected Through 3/31/2012:

1. See deconcentration information in Goal 3, Outcomes, Section 2.
2. The Capital Fund Program (CFP) (See Attachments I and J) list a variety of projects aimed at improving the appearance of properties and grounds and the quality of amenities and units.

3. The NHA is working with the Norwalk Redevelopment Agency to revitalize the transit area where the NHA offices, Leroy Downs, Washington Village, King Kennedy, 20 West Avenue and Seaview are located.

4. It is also focusing on a Choice Neighborhood opportunity for Washington Village for which it was awarded a Planning grant by HUD in 2011. Anticipate applying for a Choice Neighborhood Implementation Grant by 4/1/13 or sooner.

Goal 5. Promote Self-Sufficiency of NHA Customers

Strategies:

- a. Continue and create promotions and opportunities for customers of the NHA to improve their skills and job opportunities
 - i. Continue focus on children attending school
 - ii. Continue educational mentoring programs
 - iii. Continue other learning programs and expand where needed
 - iv. Continue scholarship programs for post-high school education
- b. Continue outreach to working families for admission to NHA programs and housing
- c. Expand the Family Self Sufficiency programs for HCV and Public Housing

Outcomes Actual and Projected Through 3/31/2012:

Family Self Sufficiency Program Goals and Accomplishments for April 1, 2010 through August 31, 2011

Activities and Outcomes	Grant Goal through 3/30/12	Actual through 8/31/11
Self-sufficiency Participants	145	145
Youth College Enrollments	3	11
Youth Summer Programs	10	125
GED & ESL	7	8
Homeownership Education	34	28 ^{*2}
Homeownerships	2	6
Credit & Financial Counseling	30	37
Improved Credit Score	5	6
Preschool Parent Education	3	5
Childcare Connections	11	31

Activities and Outcomes	Grant Goal through 3/30/12	Actual through 8/31/11
Community Service & Volunteering	30	39
Health / Certificate programs	40	28 ^{*3}
Employment Counseling	76	73
Job Readiness Programs	37	56
Employment Obtained	12	13

^{*1} Includes Grants for Section 8 Family Self-Sufficiency, Federal Public Housing Family Self-Sufficiency, ROSS Home/Health/Grow, ROSS Service Coordinator

^{*2} Homeownership workshop scheduled for October 2011

^{*3} Includes Fall 2011 enrollments

Scholarship Program

April 1, 2010 to August 31, 2010

32 College Scholarships were awarded to NHA residents in this national award winning program. 16 were repeat applicants and 16 new applicants. 22 attended 4 year colleges, 9 attended 2-year community colleges, 1 attend trade school.

Over \$140,000 was raised by the Norwalk Housing Scholarship Committee, comprised of local leaders in business/education/philanthropy, for scholarships and computers for college students. \$95,168 was committed to cash scholarships. \$4,500 promised but not acted upon. \$45,649 was spent on laptop/printer sets awarded to scholarship recipients. Through application assistance from the NHF Scholarship Program, recipients additionally received one national scholarship and \$64,000 in other scholarships. Making the grand total over \$200,000.

The Awards Ceremony was held at Stepping Stones Museum for Children. Guests included recipients, their families and many of Norwalk's elected officials and prominent citizens.

A special presentation of computers was held at the Norwalk Housing Authority 20 West Avenue Learning Center to promote college as a goal for middle school and high school youth.

September 1, 2010 to March 31, 2011

Award Recipients attended their colleges full-time and reported grades and expenses back to NH Scholarship Program as per the contract they sign upon receipt of scholarship funds.

2 Award Recipients graduated mid-year from Norwalk Community College and continued on to 4-year colleges. One, a single mother and honors student with 2 children continued at Bridgeport University in education. The other, a young man who went to college directly from high school and

then became head of household for his younger sister when their mother left their home, continued at Long Island University in sports medicine.

The Scholarship Committee launched its 2011 fund raising campaign in October. Press was notified, financial goals set and the 2011 Scholarship Application was reviewed. New donors were researched and contacted.

In December the Scholarship Committee hosted the annual College 101 Program where NHA resident families with teenage youth interested in college came to a dinner to ask questions of a panel of current Norwalk Housing College Scholarship Recipients and hear about their college experiences. For many families this is their first contact with anyone attending college and is very inspiring. Some Recipients become email "pen pals" with the younger students.

In January scholarship applicant recruitment begins with announcements in press, the NHA resident monthly newsletter and flyers. Current recipients are encouraged to promote the program in their developments. All Norwalk High Schools are emailed the applications and dates are sent for Committee representatives to come to the high schools and work with senior students on their applications and on other scholarship applications.

January through March fundraising and application recruitment continues. Applications for other scholarships are distributed. 20 West Learning Center promotes the program to participants in its free SAT Prep Program and Future Zone.

Scholarship Program

April 1, 2011 to August 31, 2011

34 College Scholarships were awarded to NHA applicants in this national award winning program. 19 were repeat applicants and 15 new applicants. 24 attend 4-year colleges, 9 attend 2-year colleges and 1 is enrolled in a 1-year vigorous medical assistant nursing program.

Over \$100,000 was raised by the Norwalk Housing Scholarship Committee, comprised of local leaders in business, education and philanthropy. \$109,000 has been committed to scholarships with \$750 promised but not acted upon. Recipients received \$94,500 in additional local scholarships plus two national scholarships, making the grand total over \$200,000.

The Awards Ceremony was held at Stepping Stones Museum for Children. Guests included recipients, their families and many of Norwalk's elected officials and prominent citizens. One student, graduating from NCC as one of "27 Women of Promise" and continuing to Temple University, addressed the reception, telling all to "follow their dreams." A special presentation of certificates was made by Congressman Jim Himes Office to all recipients.

A presentation of scholarship checks was held at the NHA 20 West Avenue Learning Center to promote college as a goal for middle school and high school youth.

A pre-college mandatory orientation session for incoming college freshmen was held in August to assist students in planning ahead for the demands of college. A speaker from NCC and two

returning recipients spoke at this dinner open to incoming freshmen and their families. Topics included 1) time management; 2) tutoring assistance; 3) developing good relationships with professors; 4) registration; 5) finding a guidance counselor; 6) managing extra-curricular activities; 7) how to use the “Buddy” system that will be newly implemented this year.

September 1, 2011 to March 31, 2012

Award Recipients attend their colleges full-time and report grades and expenses back to NH Scholarship Program as per the contract they sign upon receipt of scholarship funds.

This year a “Buddy Program” is being initiated to link scholarship freshmen with repeat recipients. Recipients are eager to volunteer for this and other programs.

The Scholarship Committee will launch its 2012 fund raising campaign in October. Press will be notified, financial goals set and the 2011 Scholarship Application will be reviewed. New donors will be researched and contacted.

In December the Scholarship Committee will host the annual College 101 Program where public housing resident families with teenage youth interested in college come to a dinner to ask questions of a panel of current Norwalk Housing College Scholarship Recipients and hear about their college experiences. For many families this is their first contact with college students.

In January scholarship applicant recruitment begins with announcements in press, the NHA resident monthly newsletter and flyers. Current recipients promote the program in their developments. All Norwalk High Schools are emailed the applications and arrangements made for in-school scholarship application workshops.

January through March fundraising and application recruitment continues. Applications for other scholarships are distributed. We already have 4 new applicant requests for 2012-2013.

Employment Empowerment Achievements:

A June 2010 assessment of student reading skills/performance showed a 78% overall increase in scores versus a baseline assessment conducted the previous fall.

An April 2010 assessment of student math skills/performance showed a 41% increase in scores versus a January 2010 baseline.

Our arts initiative continued with instruction at our dedicated Art Center. 10-15 during the school year, and 20-25 during the summer, received daily art instruction utilizing multiple techniques.

A summer drama initiative was begun in July 2010. 15-25 students from the various learning centers participated on a daily basis. The students received instruction in dramatic performance, basic playwriting, and scene construction skills. A literacy component was included in each lesson.

Expended our commitment to the physical well-being of our students through strengthened partnerships with Stepping Stones Museum for Children, and the Norwalk YMCA. The organizations offered instruction in healthy diets and the benefits of exercise, respectively.

As of May 2010 the Learning Centers had over 230 students registered. Each student's parent or guardian was required to register their child in person in order to begin fostering more effective parent/center communication.

The Learning Center Summer program had over 175 students registered across the five Learning Centers. Students participated in a variety of indoor and outdoor activities, such as weekly beach trips. In addition, NHA partnered with Fairfield County Community Foundation and Mina Foods, a local food distributor, to provide free lunches to summer program participants.

In partnership with the Family and Children's Agency of Norwalk, each Learning Center hosted the families of their respective complexes for a meet and greet "Family Night." An FCA counselor was on-hand to offer residents the opportunity for continued support outside of the Learning Center.

Learning Centers Accomplishments:

1. As of June 30, 2011 NHA Learning Centers had over 270 registered students, an increase of over 100 from our last report. We plan to expand the program even further in the coming months.
2. A June 2011 assessment of student reading skills/performance showed a 76% increase in scores versus a baseline assessment conducted the previous fall.
3. A June 2011 assessment of student math skills/performance showed a 78% increase in scores versus a December 2010 baseline assessment.
4. Utilizing funding from Norwalk's Community Development Block Grant Program, and in conjunction with the Norwalk Economic Opportunity Network, NHA presented 4 career nights to high school aged residents in Spring 2011. These events raised awareness of various careers open to students and each was attended by 25-40 residents.
5. The dedicated Art Center, opened in in the summer of 2009, continued to instruct 10-15 students per day with art, art history, and literacy related lessons.
6. Throughout Fall and Winter 2010 and Spring 2011 Learning Center staff participated in a series of professional developments seminars on the Seven Habits of Highly Effective Teachers, as well as training in conflict resolution and mediation exercises.
7. Partnering with Stepping Stones Museum for Children, 6 participants in our Early Childhood program graduated from a two-week kindergarten readiness course.
8. Continued partnerships with local organizations, such as the Norwalk YMCA and the SoNo Fieldhouse, to provide extracurricular activities to students.
9. The Summer Program continued at all Learning Center sites in 2011 with over 170 registered students. Community partnerships allowed us to offer a number of recreational activities such as swimming and indoor sports.
10. NHA, in conjunction with the Norwalk Economic Opportunity Now (NEON), participated for the first time in the Federal Summer Food Service Program. Through the program we were able to offer without cost to our students both a breakfast and a lunch during each day of the summer program.

11. NHA operates a small fleet of six vans which are used throughout the year to transport both students and adult residents to off-site programs and enrichment activities.

Goals:

1. Continue partnerships with local organizations to provide as many outside opportunities to NHA students as possible.
2. Further parent involvement in the Learning Centers through more frequent communications, and family activity nights.
3. Sustain and increase NHA reading scores. Literacy and effective communication skills are a must for student success and NHA is committed to fostering these skills in NHA students through the Literacy Program.
4. Sustain and increase NHA mathematics testing scores. Mathematical skills are a key component to future success in a number of vocations.
5. Sustain and increase the number of students who wish to gain a post-secondary education. Each year more and more of NHA Learning Center students apply for and receive NHA Scholarship Foundation assistance in paying for college. As these success stories filter through the community, more of NHA students will feel that college is a possibility for them, as well. The Learning Centers will help to foster this motivation with college info-sessions and college brochures/applications.
6. Expand our community outreach and recruitment efforts to bring in more students from other housing complexes.

Goal 6. Promote Fair Housing and Equal Opportunity

Strategies:

- a. Have staff attend Fair Housing training at least every other year.
- b. At joint meeting with City of Norwalk's Human Relations, Fair Housing, Norwalk Housing Authority and Landlords provide information on Fair Housing and Landlord/Tenant rights for Landlords by Fair Housing Officer.
- c. Send annual mailing to HCV landlords on Fair Housing and Landlord/Tenant rights prepared by City of Norwalk's Fair Housing Officer and Director of Human Relations and Fair Rent.
- d. Send an annual mailing to all public housing voucher participants prepared by City of Norwalk's Director of Human Relations and Fair Rent and Fair Housing Officer which may include training invitations.
- e. Add FAQ on Fair Housing and Landlord/Tenant rights to NHA's website if prepared by Director of Human Relations and Fair Rent and Fair Housing Officer.
- f. Invite the Fair Housing Officer and Human Relations and Fair Rent Director to participate in group HCV briefings.
- g. Review the Analysis of Impediments to Fair Housing for NHA policies and programs.
- h. Request the Norwalk Redevelopment Agency review and prioritize its Analysis of Impediments to Fair Housing.

Outcomes Actual and Projected Through 3/31/2012:

Based upon the Norwalk Redevelopment Agency's (NRA) 2010 Analysis of Impediments to Fair Housing, the Norwalk Housing Authority (NHA) evaluated how it could positively impact and further fair housing in Norwalk.

The Norwalk Redevelopment Agency's preliminary analysis of Norwalk's marketplace led to identification of five impediments as follows:

1. Discrimination in the housing market
2. Housing affordability
3. Zoning, Planning and land use issues
4. Local opposition (NIMBY)
5. Lending practices

The Housing Authority reviewed its own operations and developed actions to implement the recommendations in that Plan.

The actions the NHA has taken to further Fair Housing are listed below:

A. Direct Fair Housing Activities

1. The NHA provides information at Voucher Issuance to all participants on how to file a Fair Housing Complaint with handouts and invites the City of Norwalk's Fair Housing and Fair Rent staff to participate in briefings and training.
2. In 2007 a 2 tier Fair Market Rent payment standards was established to promote renting of units in areas of Norwalk with higher incomes, less unemployment, lower concentration of minority residents and higher homeownership rates outside of census tracts 432, 434, 437, 438, 440, 441, 442, 444 and 445. (For results see Goal 3 above). Results are monitored and where appropriate surveys may be conducted to explore findings of any problems.
3. Conducts an HCV landlord Open House to promote and explain the program in conjunction with the Fair Housing and Human Relations departments of the City of Norwalk. Sessions include training in Fair Housing regulations. The last HCV landlord Open House occurred in October 2011.
4. Provides opportunities for LRPH and HCV staff training in Fair Housing, on a regular basis. The last training occurred in May 2011.
5. Quarterly monitoring of income deconcentration by development and where necessary implements income skipping measures.
6. When available, employment opportunities are advertised in accordance with Equal Employment Opportunity
7. When necessary, opportunities to apply for housing are advertised in accordance with Affirmative Fair Housing Marketing Plan.
8. Continued to provide translators as necessary.
9. In response to 2010 HUD Notice of Funding availability applied for 100 vouchers for people with disabilities which was not funded.

B. Indirect Fair Housing Activities

1. Continue planning of affordable housing on West Cedar Street to create a mixed income community, while maintaining all 200 Section 8 project based units.
2. Choice Neighborhoods Planning Grant applied for and received from HUD to redevelop Washington Village and apply for a Choice Neighborhoods Implementation grant to deconcentrate poverty and improve housing quality. This plan includes an area south of Washington Street, east of Martin Luther King Boulevard, west of Water Street and north of Concord St.
3. Continue to implement Voucher Homeownership Program to help participants address the high cost of housing.
4. Promotes asset development of public housing and voucher participants by implementing a Family Self Sufficiency Program, which can be used for homeownership. (Since the program began in 2005 there have been 32 new homeowners created).
5. To improve public housing quality, maintain implementation schedule for capital fund program.
6. To assist as many families as possible with the high cost of housing, had 98.6% lease up rate for housing choice voucher program as of 9/1/2011. The average nationwide lease up rate is 91%.
7. To help HCV program participants accumulate assets for homeownership or other long term goals, operated the Housing Choice Voucher Family Self Sufficiency Program since 2005 until present.
8. To help Public Housing residents accumulate assets for homeownership other long term goals operated a Public Housing Family Self Sufficiency Program since 2006 until present.
9. To assist in these homeownership efforts and to enhance employment, a HUD ROSS grant was sought and received. This grant provides case management services through a third party.
10. To increase the earning potential and further homeownership accessibility of low income students, NHA works with the private and foundation sector to award college scholarships.

<u>Year Offered</u>	<u>Awards</u>	<u>Total Amounts</u>
2005	13	\$ 33,000
2006	20	\$ 55,500
2007	25	\$ 72,250
2008	32	\$105,100
2009	26	\$109,000
2010	32	\$124,199
2011	34	\$109,000

11. To improve educational performance and earning potential obtained Connecticut After School Grant program for reading program with certified reading teachers and Haskins Laboratory/Literacy HOW staff trainer, since 2007 and funded through 2010. A 2011 application is pending at this time (9/15/2011).
12. Also received a 2011 CDBG grant to enhance the educational efforts in item 20 above by improving the Learning Center facilities at Roodner Court.
13. Work with Norwalk Public Schools to operate Priority After School Program Grants for Fox Run, Ponus and Wolfpit Elementary schools to improve educational outcomes. Applying for Silvermine School in 2011.

14. To increase youth educational outcomes and (permitting adults to work), it has operated 5 academically oriented after school and summer centers since 2003.
15. Continue to assist seniors and the disabled at all developments by providing a resident services coordinator.

IN ADDITION TO THE ABOVE ACCOMPLISHMENTS, THE NHA WAS ABLE TO SECURE THE FOLLOWING GRANTS WHICH PROVIDE RESOURCES FOR THE GOALS LISTED ABOVE

Grants received by Norwalk Housing Authority 2011

1. HUD 2010 Public Housing Family Self Sufficiency grant, \$69,000
2. HUD 2010 Family Self Sufficiency Housing Choice Voucher grant, \$69,000
3. United Way Math Literacy program, \$45,000
4. CDBG37 Roodner Court Learning Center renovation project, \$43,000
5. Connecticut State Department Education (CSDE) **Afterschool grant for \$150,000**. The grant will support the Literacy program at the Learning Centers. The grant will fund the part-time salaries of two reading coaches and a reading coach manger.
6. HUD 2011 **Public Housing Family Self Sufficiency Program -- \$69,000** to continue to fund the salaries and fringe benefits of a coordinator to promote and foster assistance with public and private resources to enable participating families to increase earned income, financial literacy, reduce or eliminate the need for welfare assistance, and to make progress toward economic independence and self- sufficiency.
7. HUD 2011 **Family Self Sufficiency Housing Choice Voucher Program -- \$69,000** to continue to fund the salary and fringe benefits of a coordinator to ensure continuity of services to those families currently enrolled in HCV FSS program. The coordinator would promote strategies to enhance education, training and job opportunities that are available to HCV FSS program participants.

Pending Grant Applications

1. HUD 2011 **Ross Service Coordinator \$240,000** three year grant to fund a full-time coordinator to serve residents living in King Kennedy, Meadow Gardens, Chapel Street, 36 Fairfield Avenue, and Main Avenue. The coordinator would promote service delivery including education, job training, and other referrals to 50 residents.
2. HUD 2010 **Section 3** grant would fund the salary and fringe of a coordinator in the amount of **\$50,000**. The grant would expand NHA capacity to meet the regulatory requirements of Section 3.
3. **Walmart \$4,500** under Walmart's education initiative, an application was submitted to support the literacy initiatives in the Learning Centers.

Not Received

4. **HUD 2011 Capital Fund Education and Training Community Facilities Program**. NHA submitted an application for \$3.5M to fund the renovation of a facility that would provide job training and/or adult education for public housing residents.

FSS and Other Service Programs Report

PROGRAM NAME	VALUE OF PROGRAM TO PARTICIPANT	LOCATION	SCHEDULE	OBJECTIVE / OVERVIEW
Job Training Referral & Employment Referral	\$150	NHA	Throughout the year	FSS Coordinators provide Job Training referrals to private and nonprofit agencies and referrals to different employment opportunities.
Food Stamps Workshop	Free	NHA	Throughout the year	These workshops will provide residents with critical information such as what are the qualifications for food stamps, what documents are needed to provide and how much assistance can you get. Residents learn how to fill out the application and where to send it for faster process time
Money Management Workshop	\$400	NHA	Throughout the year	Understanding Money and Credit: all you ever wanted to know about budgeting and credit. This Workshop encourages participants to examine their own financial health. The Workshop focuses on the importance of setting financial goals and developing a spending plan.
Credit Counseling & Referral Workshop	\$400	NHA	Throughout the year	This Workshop will teach how to you overcome debt, regain financial stability, and save for your future. Certified counselors will help you assess your financial situation, develop a spending plan, set financial goals, and create a personalized action plan. You will learn how to obtain, review and dispute your Credit Report.
First Time Home Buying Workshop	\$450	NHA	Throughout the year	This one-day Workshop gives homebuyers a step-by-step guide to buying a home, as well as assessing financial readiness to do so. You will learn what to expect and what is expected of you. Participants receive a workbook and a certificate of completion.

PROGRAM NAME	VALUE OF PROGRAM TO PARTICPANT	LOCATION	SCHEDULE	OBJECTIVE / OVERVIEW
From Home Search To Closing Day workshop	\$500	NHA	Throughout the year	This Workshop gives homebuyers a step-by-step guide to buying a home. You will learn what to expect and what will be expected of you to ensure the home buying process goes smoothly. You will receive a comprehensive home buying workbook.
Money Matters Workshop	\$300	NHA	Throughout the year	This Workshop will teach financially challenged clients how to budget their limited income by managing energy, housing, clothing and food dollars.
Peace Begins at Home	\$15	NHA	Throughout the year	This workshop helps participants understand anger triggers and identify anger signals and to be in control of your feelings and not have angry feelings control you. participants learn different strategies to be able to get calm and learn ways to resolve conflict.
Take Control of Your Finances	\$300	NHA	Throughout the year	This workshop helps participants establish and prioritize financial goals, create a spending plan and manage income and expenses through budgeting.
Protect Yourself and Yor Assets	\$300	NHA	Throughout the year	Participants learn how to protect themselves and assets from thieves who can steal your information, recognize the tricks of a con-artist and understand the tell-tale warning signs of a scam.
Your Credit Your Life	\$250	NHA	Throughout the year	This workshop provides the best financial practices to reducing debt and reducing monthly bills.

AGE GROUP	PROGRAM NAME	VALUE OF PROGRAM TO PARTICPANT	LOCATION	INSTRUCTOR	SCHEDULE	OBJECTIVE / OVERVIEW
Early Childhood 0-5 Years Old	Gymnastics & Karate	\$400	The Little Gym, 187 Water St.	Erica Newman	Tues 4:45-5:45 PM & Wed. 5:30-6:00 PM	This curriculum offers children a multitude of life enhancing benefits that will prepare them for a lifetime of success by building social and intellectual skills. The child gains self-control, discipline, and strengthens the body and mind through Karate.
Early Childhood 0-5 Years Old	Parents As Teachers- Family Resource Center	\$200	Roodner Court	Parent Educator- Akisha Cassermer	Thurs. 12:30-1:30 PM	Helps adults become good parents by hearing answers to questions concerned with child rearing pertaining to age while incorporating play.
Early Childhood 0-5 Years Old	Parents As Teachers- Family Resource Center	\$200	Fox Run School	Parent Educators	Tues. 10:00-11:00 Am & Fri. 9:00-10:00 AM	Helps adults become good parents by hearing answers to questions concerned with child rearing pertaining to age while incorporating play.
Early Childhood 0-5 Years Old	Parents As Teachers- Family Resource Center	\$200	Washington Village & Meadow Gardens	Parent Educator- Akisha Cassermer	TBD	Helps adults become good parents by hearing answers to questions concerned with child rearing pertaining to age while incorporating play.
0 Early Childhood 0-5 Years Old	Stepping Stones Museum	\$400	303 West Ave.	Trained Staff	TBD	Interactive learning facility to help children develop academically in an interesting, challenging, and fun way.
Early Childhood 0-5 Years Old	South Norwalk Library	\$200	Washington Street	Children's Librarian	Monthly ongoing events. Call Ann Prince-NHA Early Childhood Coordinator at 203-838-8471 ext. 187	Early pre-school reading experience: attending story hour, along with hands on interaction programs offered at the library contributes significantly to high reading levels.

AGE GROUP	PROGRAM NAME	VALUE OF PROGRAM TO PARTICIPANT	LOCATION	INSTRUCTOR	SCHEDULE	OBJECTIVE / OVERVIEW
Elementary School	LEARNING CENTERS	12,500 per year	RC, MG, WV, CV	NHA Staff	M-F, 2:30-7:30 PM	Provide safe and structured environment for homework help, academics, computer usage, and various enrichment programs
Elementary School	LITERACY PROGRAM	\$9,000 per year	King Kennedy	NHA Staff/ Certified Teachers/ Reading Coaches	M-F, 4:30-6:30 PM	Activities are separated into 3 stations emphasizing writing, listening, and comprehension. The Informal Reading Inventory is used to quarterly assess and track student progress and develop individual curriculum
Elementary School	READ ALOUD SERIES	\$100	TBD	NHA Staff/ Volunteers	TBD	NHA staff and/or outside volunteers read aloud stories to learning center students.
Elementary School	LATIN DRUMMING	\$400	20 West Ave	John Stuart	TBD	Students learn the art of Latin drumming in an upbeat fun environment.
Elementary School	Summer camp	\$2,000	RC, MG, WV, CV	NHA Staff	M-F 9:00-4:00 PM	Participants will enjoy Physical activities, free games, literacy support, arts & craft, and more.
Elementary School	Math Program	5,000	20 West, RC, MG, WV	NHA Staff	M-F 3-6	Participants practice and learn math skills in a hybrid traditional and web-based format.
Elementary School	Storytelling	\$1,000	RC, MG, WV, CV	Laconia Therrio	M W 5-6	Participants learn the ancient art of storytelling and public presentation.

AGE GROUP	PROGRAM NAME	VALUE OF PROGRAM TO PARTICIPANT	LOCATION	INSTRUCTOR	SCHEDULE	OBJECTIVE / OVERVIEW
High School	LEARNING CENTERS	\$12,500 per year	20 West	NHA Staff	M-F, 2:30-7:30 PM	Provide safe and structured environment for homework help, academics, computer usage, and various programs
High School	LITERACY PROGRAM	\$9,500 per year	King Kennedy	NHA Staff/ Certified Teachers/ Reading Coaches	M-F, 4:30-6:30 PM	Activities are separated into 3 stations emphasizing topics like writing, listening, and comprehension. The Informal Reading Inventory is used to quarterly assess and track student progress and develop individual curriculum.
High School	Summer camp	\$2,000	20 West	NHA Staff	M-F 9:00-4:00 PM	Participants will enjoy Physical activities, free games, literacy support, arts & craft, and more.
High School	Math Program	\$5,000	20 West	NHA Staff	M-F 3-6	Participants practice and learn math skills in a hybrid traditional and web-based format.

ATTACHMENT B1: AMENDMENTS TO THE ACOP AND ADMINISTRATIVE PLANS

Please note that sections quoted are to provide for the context and placement of the changes only. For full text of the Section please see the ACOP and Administrative Plan on file at the Housing Authority Offices.

Also please note that any ACOP or HCV Administrative Plan references to Attachments or Appendices in the text of the changes below, refer to such documents in the ACOP and HCV Administrative Plan only; not to Attachments to this PHA Plan.

Admissions and Continued Occupancy Plan (ACOP) Revisions **ACOP CHAPTER 3 REVISIONS**

Current Policy

3.P. SOCIAL SECURITY NUMBERS [24 CFR 5.216 and 5.218]

For every family member age 6 or older the family must provide documentation of a valid Social Security Number (SSN) or a certification stating that no SSN has been issued. If a family member who is required to execute a certification is less than 18 years old, the certification must be executed by the individual's parent or guardian [24 CFR 5.216(j)]. Assistance cannot be provided to a family until all SSN documentation requirements are met. A detailed discussion of acceptable documentation is provided in Chapter 7.

If a new member who is at least six years of age is added to the family, the new member's SSN documentation must be submitted at the family's next interim or regular reexamination, whichever comes first. If any member of the family who is at least six years of age obtains a previously undisclosed SSN, or has been assigned a new SSN, the documentation must be submitted at the family's next regularly scheduled reexamination.

The PHA must deny assistance to an applicant family if they do not meet the SSN disclosure, documentation and verification, and certification requirements contained in 24 CFR 5.216.

NHA Policy

The NHA requires that all members of a household must provide Social Security numbers irrespective of age and relationship to the head of household.

Proposed Policy

3.P. SOCIAL SECURITY NUMBERS [24 CFR 5.216, 5.218, 5.233 and PIH Notice 2010-3]

SSN Disclosure:

In accordance with 24 CFR 5.216, applicants and participants (including each member of the household) are required to disclose his/her assigned SSN, with the exception of the following individuals:

- a. Those individuals who do not contend to have eligible immigration status

(individuals who may be unlawfully present in the United States). These individuals in most instances would not be eligible for a SSN.

1. A family that consists of a single household member (including a pregnant individual) who does not have eligible immigration status is **not eligible** for housing assistance and cannot be housed.

2. A family that consists of two or more household members **and at least one** household member that has eligible immigration status, is classified as a mixed family, and **is eligible** for prorated assistance in accordance with 24 CFR 5.520. The PHA may **not** deny assistance to mixed families due to nondisclosure of an SSN by an individual who does not contend to have eligible immigration status.

b. Existing program participants as of January 31, 2010, who have previously disclosed their SSN and HUD has determined the SSN to be valid. PHAs may confirm HUD's validation of the participant's SSN by viewing the household's **Summary Report** or the **Identity Verification Report** in the EIV system.

c. Existing program participants as of January 31, 2010, who are 62 years of age or older, and had not previously disclosed a valid SSN. This exemption continues even if the individual moves to a new assisted unit.

NHA Policy

The NHA requires that all members of a household provide Social Security numbers irrespective of age and relationship to the head of household, with the exception of those individuals who do not contend to have eligible immigration status.

Once the individual's verification status is classified as **verified**, the PHA should remove and destroy, by no later than the next re-exam of family income or composition, the copy of the documentation referenced in Section 6: SSN Documentation (Acceptable evidence of SSN) on PIH Notice 2010-3. Paper documentation should be destroyed by either shredding or burning. Electronic documentation should be destroyed by erasing or permanently deleting the file. The retention of the EIV report in the tenant file is adequate. PHAs are encouraged to minimize the number of tenant records that contain documents which display the full nine-digit SSN [PIH Notice 2010-3].

NHA Policy

Once NHA verifies and classifies the individual's SSN status, NHA will remove and destroy by shredding, no later than the next re-exam date, any documents containing social security numbers. EIV reports shall be maintained in the tenant file.

ACOP CHAPTER 5 REVISIONS

Current Policy

5.A. BRIEFING

At any briefing, the PHA must ensure effective communication in accordance with Section 504 requirements (Section 504 of the Rehabilitation Act of 1973) and LEP requirements. It will ensure that the briefing site and application process is fully accessible to individuals with disabilities. For a more thorough discussion of accessibility requirements, refer to Chapter 2.

NHA Policy

The NHA will conduct oral briefings.

The NHA generally conducts these briefings at group meetings (typically when 2 or more people are being briefed in a two week period).

Families who attend group briefings and still have the need for further explanation will be requested to contact the NHA.

If necessary because of an applicant's disability preventing full participation in the application process, the NHA will make other arrangements.

Briefings will be conducted in English or other languages, as required by Section 504 or by the NHA's LEP policy (APPENDIX D).

Proposed policy

5.A. BRIEFING

At any briefing, the PHA must ensure effective communication in accordance with Section 504 requirements (Section 504 of the Rehabilitation Act of 1973) and LEP requirements. It will ensure that the briefing site and application process is fully accessible to individuals with disabilities. For a more thorough discussion of accessibility requirements, refer to Chapter 2.

NHA Policy

The NHA will conduct oral briefings.

The NHA generally conducts these briefings as individual meetings

If necessary because of an applicant's disability preventing full participation in the application process, the NHA will make other arrangements.

Briefings will be conducted in English or other languages, as required by Section 504 or by the NHA's LEP policy (APPENDIX D).

New Proposed Policy

5. B. LEASE AND FAMILY OBLIGATIONS

SMOKE-FREE HOUSING POLICY

To promote better air quality and safety of residents in its housing programs, NHA has declared all its residential properties as smoke free.

Smoking is only permitted twenty (20) feet from any building located on NHA properties and is not permitted anywhere inside properties owned by NHA to include but not limited to resident dwellings, common areas, hallways, maintenance buildings and NHA office. This policy applies to all residents, guests, and employees, contractors, and business invitees who provide services to NHA properties.

All NHA residents are required to sign a copy of the smoke free policy to be placed in the resident's file.

SMOKE FREE POLICY ENFORCEMENT

Violation of this policy is a material breach of the resident's lease. In circumstances where smoking is observed and/or reported, NHA will seek the specific source of the tobacco or other smoke and take appropriate action consistent with the enforcement of this policy.

ACOP CHAPTER 7 REVISIONS

Current Policy

INTRODUCTION

The PHA must verify all information that is used to establish the family's eligibility and level of assistance and is required to obtain the family's consent to collect the information. Applicants and program tenants must cooperate with the verification process as a condition of receiving assistance. The PHA must not pass on the cost of verification to the family.

The PHA will follow the verification guidance provided by HUD in PIH Notice 2004-01 Verification Guidance and any subsequent guidance issued by HUD. This chapter summarizes those requirements and provides supplementary PHA policies.

Verification policies, rules and procedures will be modified as needed to accommodate persons with disabilities. All information obtained through the verification process will be handled in accordance with the records management policies of the PHA.

Proposed policy

INTRODUCTION

The PHA must verify all information that is used to establish the family's eligibility and level of assistance and is required to obtain the family's consent to collect the information. Applicants and program tenants must cooperate with the verification process as a condition of receiving assistance. The PHA must not pass on the cost of verification to the family.

The PHA will follow the administrative guidance and any subsequent guidance issued by HUD related to the mandated use of HUD's Enterprise Income Verification (EIV) system as per PIH Notice 2010-19. This chapter summarizes the requirements and provides supplementary PHA policies.

Verification policies, rules and procedures will be modified as needed to accommodate persons with disabilities. All information obtained through the verification process will be handled in accordance with the records management policies of the PHA.

Current policy

7.A. FAMILY CONSENT TO RELEASE OF INFORMATION [CFR 5.230]

The family must supply any information that the PHA or HUD determines is necessary to the administration of the program and must consent to PHA verification of that information.

Consent Forms

It is required that all adult applicants and tenants sign form HUD-9886, Authorization for Release of Information. The purpose of form HUD-9886 is to facilitate automated data collection and computer matching from specific sources and provides the family's consent only for the specific purposes listed on the form. HUD and the PHA may collect information from State

Wage Information Collection Agencies (SWICAs) and current and former employers of adult family members. Adult family members must sign other consent forms as needed to collect information relevant to the family's eligibility and level of assistance.

Penalties for Failing to Consent [24 CFR 5.232]

If any family member who is required to sign a consent form fails to do so, the PHA will deny admission to applicants and terminate assistance of tenants. The family may request an informal review (applicants) or informal hearing (tenants) in accordance with PHA procedures.

HUD's Verification Hierarchy

HUD authorizes the PHA to use five methods to verify family information and specifies the circumstances in which each method will be used. In general HUD requires the PHA to use the most reliable form of verification that is available and to document the reasons when the PHA uses a lesser form of verification. In order of priority, the forms of verification that may be used are:

- Electronic (EIV) or Up-front Income Verification (UIV) whenever available
- Third-party Written Verification
- Third-party Oral Verification
- Review of Documents
- Self-Certification

Each of the verification methods is discussed in subsequent sections below. The full notice PIH 2004-1 should be studied carefully, especially pp. 11-14 which provide a table of guidance with respect to how each method may be used.

Proposed Policy

HUD's Verification Hierarchy

HUD authorizes the PHA to use six levels to verify family information and specifies the circumstances in which each method will be used. In general HUD requires the PHA to use the most reliable form of verification that is available and to document the reasons when the PHA uses a lesser form of verification. In order of priority, the forms of verification that may be used are:

- Electronic (EIV) or Up-front Income Verification (UIV), using HUD's Enterprise Income Verification (EIV) system
- Up-Front Income Verification (UIV), using non-HUD systems
- Third-party Written Verification
- Third-party Written Verification Form
- Third-party Oral Verification Form
- Self-Certification/Tenant Declaration

Each of the verification methods is discussed in subsequent sections below [PIH Notice 2010-19].

Requirements for Acceptable Documents

NHA Policy

Any documents used for verification must be the original (not photocopies), must be the most current and generally must be dated within 120 calendar days (for new applicants being processed into the ready pool) and 60 calendar days (for recertifying residents) of the date they are provided to the NHA. The documents must not be damaged, altered or in any way illegible.

Faxes and print-outs from web pages are considered original documents.

The NHA staff member who views the original document must make a photocopy, annotate the copy with the name of the person who provided the document and the date the original was viewed, and sign the copy, which is retained by the NHA.

Any family self-certifications must be made in a format acceptable to the NHA and must be signed in the presence of a NHA representative or any notary public.

File Documentation

The PHA must document in the file how the figures used in income and rent calculations were determined. All verification attempts, information obtained, and decisions reached during the verification process will be recorded in the family's file in sufficient detail to demonstrate that the PHA has followed all of the verification policies set forth in this plan. The record should be sufficient to enable a staff member or HUD reviewer to understand the process followed and conclusions reached.

Current Policy

7.B. UP-FRONT INCOME VERIFICATION (UIV) OR ELECTRONIC VERIFICATION (EIV)

EIV or Up-front income verification (UIV) refers to the PHA's use of the verification tools available from independent sources that maintain computerized information about earnings and benefits. EIV/UIV will be used to the extent that these systems are available to the PHA.

The PHA must restrict access to and safeguard EIV/UIV data in accordance with HUD guidance on security procedures, as issued and made available by HUD.

NHA Policy

[See Appendix B "EIV Security Procedures"]

Proposed Policy

7.B. UP-FRONT INCOME VERIFICATION (UIV) OR ELECTRONIC VERIFICATION (EIV) (Level 6/5)

There may be legitimate differences between the information provided by the family and EIV/UIV-generated information. No adverse action can be taken against a family until the PHA has independently verified the EIV/UIV information and the family has been granted an opportunity to contest any adverse findings through the informal review/hearing process of the PHA.

Definition of Substantial Difference

EIV/UIV information is used differently depending upon whether there is a *substantial difference* between information provided by the family and the EIV/UIV information. In "HUD Guidelines for Projecting Annual Income When UIV Data is Available" [HUD website, April 2004], HUD recommends using \$200 per month as the threshold for a substantial difference.

NHA POLICY

The NHA will use \$200/month as the threshold for substantial difference.

See Chapter 6 for the PHA's policy on the use of EIV/UIV to project annual income and for the PHA's threshold for substantial difference.

When No Substantial Difference Exists

If EIV/UIV information does not differ substantially from family information, the EIV/UIV documentation may serve as third-party written verification.

When a Substantial Difference Exists

When there is a substantial difference between the information provided by the EIV/UIV source and the family, the PHA must request another form of third-party written verification and use any other verification methods (in priority order) to reconcile the difference(s).

Proposed Policy Addition

7.C. THIRD-PARTY WRITTEN VERIFICATION (level 4)

HUD's current verification hierarchy defines two types of written third-party verification. The more preferable form, "written third-party verification," consists of an original document generated by a third-party source, which may be provided to the PHA by the family. If written third-party verification is not available, the PHA must attempt to obtain a "written third-party verification form." This is standardized form used to collect information from a third-party.

Current Policy

7.C. THIRD-PARTY WRITTEN AND ORAL VERIFICATION

Reasonable Effort and Timing

Unless third-party verification is not required as described below, HUD requires the PHA to make at least two unsuccessful attempts to obtain third-party verification before using another form of verification .

NHA Policy

The NHA will diligently seek third-party verification using a combination of written and oral requests of verification sources. Information received orally from third parties may be used either to clarify information provided in writing by the third party or as independent verification when written third-party verification is not received in a timely fashion.

The NHA may mail, fax, e-mail, or hand deliver third-party written verification requests and will accept third-party responses using any of these methods. The NHA will send a written request for verification to each required source within 5 business days of securing a family's authorization for the release of the information and give the source 10 business days to respond in writing. If a response has not been received by the 11th business day, the NHA will request third-party oral verification.

The NHA will make a minimum of two attempts, one of which may be oral, to obtain third-party verification. A record of each attempt to contact the third-party source (including no-answer calls) and all contacts with the source will be documented in the file. Regarding third-party oral verification, NHA staff will record in the family's file the name and title of the person contacted, the date and time of the conversation (or attempt), the telephone number used, and the facts provided.

When any source responds orally to the initial written request for verification the NHA will accept the oral response as oral verification but will also request that the source complete and return any verification forms that were provided.

If a third party agrees to confirm in writing the information provided orally, the NHA will wait no more than 5 business days for the information to be provided. If the information is not provided by the 6th business day, the NHA will use any information provided orally in combination with reviewing family-provided documents.

When Third-Party Information is Late

When third-party verification has been requested and the timeframes for submission have been exceeded, the PHA will use the information from documents on a provisional basis. If the PHA later receives third-party verification that differs from the amounts used in income and rent determinations and it is past the deadline for processing the reexamination, the PHA will conduct an interim reexamination to adjust the figures used for the reexamination, regardless of the PHA's interim reexamination policy.

When Third-Party Verification is Not Required

Primary Documents

Third-party verification is not required when legal documents are the primary source, such as a birth certificate or other legal documentation of birth.

Certain Assets and Expenses

The PHA will accept a self-certification from a family as verification of assets disposed of for less than fair market value.

The PHA will determine that third-party verification is not available if the asset or expense involves an insignificant amount, making it not cost-effective or reasonable to obtain third-party verification.

NHA Policy

The NHA will use review of documents in lieu of requesting third-party verification when the market value of an individual asset or an expense is less than \$5,000 annually and the family has original documents that support the declared amount.

Certain Income, Asset and Expense Sources

The PHA will determine that third-party verification is not available when it is known that an income source does not have the ability to provide written or oral third-party verification. For example, the PHA will rely upon review of documents when the PHA determines that a third party's privacy rules prohibit the source from disclosing information. Another example would be where the Social Security Administration (SSA) has refused to respond to requests for third-party verification.

NHA Policy

The NHA also will determine that third-party verification is not available when there is a service charge for verifying an asset or expense.

If the family cannot provide original documents, the NHA will pay the service charge required to obtain third-party verification, unless it is not cost effective in which case a self-certification will be acceptable as the only means of verification. The cost of verification will not be passed on to the family.

The cost of postage and envelopes to obtain third-party verification of income, assets, and expenses is not an unreasonable cost.

Proposed Policy

7.D. THIRD-PARTY WRITTEN AND ORAL VERIFICATION (Level 3/2)

NHA Policy

The NHA will diligently seek third-party verification using a combination of written and oral requests of verification sources. Information received orally from third parties may be used either to clarify information provided in writing by the third party or as independent verification when written third-party verification is not received in a timely fashion.

The NHA may mail, fax, e-mail, or hand deliver third-party written verification requests and will accept third-party

responses using any of these methods. The NHA will send a written request for verification to each required source within 5 business days of securing a family's authorization for the release of the information and give the source 10 business days to respond in writing. If a response has not been received by the 11th business day, the NHA will request third-party oral verification.

The NHA will make a minimum of two attempts, one of which may be oral, to obtain third-party verification. A record of each attempt to contact the third-party source (including no-answer calls) and all contacts with the source will be documented in the file. Regarding third-party oral verification, NHA staff will record in the family's file the name and title of the person contacted, the date and time of the conversation (or attempt), the telephone number used, and the facts provided.

When any source responds orally to the initial written request for verification the NHA will accept the oral response as oral verification but will also request that the source complete and return any verification forms that were provided.

If a third party agrees to confirm in writing the information provided orally, the NHA will wait no more than 5 business days for the information to be provided. If the information is not provided by the 6th business day, the NHA will use any information provided orally in combination with reviewing family-provided documents.

When Third-Party Information is Late

When third-party verification form has been requested and the timeframes for submission have been exceeded, the PHA will use tenant declaration. If the PHA later receives third-party verification that differs from the amounts used in income and rent determinations and it is past the deadline for processing the reexamination, the PHA will conduct an interim reexamination to adjust the figures used for the reexamination, regardless of the PHA's interim reexamination policy.

Proposed Policy Addition

Exceptions to third-party verification requirements

Oftentimes, the PHA may have made numerous attempts to obtain the required verifications with no success, or it may not be cost effective to obtain third party verification of income, assets, or expenses, when the impact on total tenant payment is minimal. In these cases, the PHA is required to document in the family file the reason(s) why third party verification was not available.

The PHA will accept a self-certification from a family as verification of assets disposed of for less than fair market value.

Certain Income, Asset and Expense Sources

The PHA will determine that third-party verification is not available when it is known that an income source does not have the ability to provide written or oral third-party verification. For example, the PHA will rely upon self-certification when the PHA determines that a third party's privacy rules prohibit the source from disclosing information. Another example would be where the Social Security Administration (SSA) has refused to respond to requests for third-party verification.

NHA Policy

If the family cannot provide original documents, the NHA will pay the service charge required to obtain third-party verification, unless it is not cost effective in which case a self-certification will be acceptable as the only means of verification. The cost of verification will not be passed on to the family.

The cost of postage and envelopes to obtain third-party verification of income, assets, and expenses is not an unreasonable cost.

Current Policy

7.D. REVIEW OF DOCUMENTS

Using Review of Documents as Verification

If the PHA has determined that third-party verification is not available or not required, the PHA will use documents provided by the family as verification.

The PHA may also review documents when necessary to help clarify information provided by third parties. In such cases the PHA will document in the file how the PHA arrived at a final conclusion about the income or expense to include in its calculations.

Proposed policy

remove this section [7.D. Review of Documents]

Current Policy

7.E. SELF-CERTIFICATION

When information cannot be verified by a third party or by review of documents, family members will be required to submit self-certifications attesting to the accuracy of the information they have provided to the PHA.

NHA Policy

The NHA may require a family to certify that a family member does not receive a particular type of income or benefit.

The self-certification must be made in a format acceptable to the NHA and must be signed by the family member whose information or status is being verified. All self-certifications must be signed in the presence of a NHA representative or notary public.

Proposed Policy

7.E. SELF-CERTIFICATION/TENANT DECLARATION (level 1)

The tenant submits an affidavit or notarized statement of reported income and/or expenses to the PHA. The PHA must document in the tenant file why third-party was not available.

When information cannot be verified by a third party document or third-party form, family members will be required to submit self-certifications attesting to the accuracy of the information they have provided to the PHA.

NHA Policy

The NHA may require a family to certify that a family member does not receive a particular type of income or benefit.

The self-certification must be made in a format acceptable to the NHA and must be signed by the family member whose information or status is being verified. All self-certifications must be signed in the presence of a NHA representative or notary public.

Current Policy

7.G. SOCIAL SECURITY NUMBERS [24 CFR 5.216]

For every family member age 6 or older, the family must provide documentation of a valid social security number (SSN), or a self-certification stating that no SSN has been issued. The self-certification must be executed personally by any family member 18 or older, or by a parent or guardian for a minor.

NHA Policy

It is the policy of the NHA to collect SS #s for all children of all ages.

The NHA will also accept the following documents as evidence if the SSN is provided on a letter from Social Security

If the family reports an SSN but cannot provide acceptable documentation of the number, the PHA will require a self-certification stating that documentation of the SSN cannot be provided at this time. The PHA will require documentation of the SSN within 60 calendar days from the date of the family member's self-certification mentioned above. If the family is an applicant, assistance cannot be provided until proper documentation of the SSN is provided.

NHA Policy

The NHA will instruct the family to obtain a duplicate card from the local Social Security Administration (SSA) office.

For individuals who are at least 62 years of age and are unable to submit the required documentation of their SSN within the initial 60-day period, the NHA may grant an additional 60 calendar days to provide documentation.

Social security numbers must be verified only once during continuously-assisted occupancy. If any family member obtains an SSN after admission to the program, the new SSN must be disclosed at the next regularly scheduled reexamination. In addition, if a child reaches the age of 6 and has no SSN, the parent or guardian must execute a self-certification stating that the child has no SSN at the next regularly scheduled reexamination.

NHA Policy

Upon the birth of a child or a legal adoption, the family must provide a SSN for the addition/s within 30 days.

The social security numbers of household members, such as live-in aides, must be verified for the purpose of conducting criminal background checks.

Proposed Policy

7.G. SOCIAL SECURITY NUMBERS [24 CFR 5.216 and PIH Notice 2010-3]

NHA Policy

NHA will accept the following as evidence of a SSN:

- a. an original SSN card issued by SSA*
- b. an original SSA-issued document, which contains the name and SSN of the individual, or*
- c. an original document issued by a federal, state, or local government agency, which contains the name and SSN of the individual.*

If the family reports an SSN but cannot provide acceptable documentation of the number, the PHA will require a self-certification stating that documentation of the SSN cannot be provided at this time. The PHA will require documentation of the SSN within 60 calendar days from the date of the family member's self-certification mentioned above. If the family is an applicant, assistance cannot be provided until proper documentation of the SSN is provided.

NHA Policy

For individuals who are at least 62 years of age and are unable to submit the required documentation of their SSN within the initial 60-day period, the NHA may grant an additional 60 calendar days to provide documentation.

Social security numbers must be verified only once during continuously-assisted occupancy. If any family member obtains an SSN after admission to the program, the new SSN must be disclosed at the next regularly scheduled reexamination. In addition, if a child reaches the age of 6 and has no SSN, the parent or guardian must execute a self-certification stating that the child has no SSN at the next regularly scheduled reexamination.

NHA Policy

Upon the birth of a child or a legal adoption, the family must provide a SSN for the addition/s within 30 days.

The social security numbers of household members, such as live-in aides, must be verified for the purpose of conducting criminal background checks.

Requirements for Acceptable Documents

NHA Policy

Any documents used for verification must be the original (not photocopies), must be the most current and generally must be dated within 120 calendar days (for new applicants being processed into the ready pool) and 60 calendar days (for recertifying residents) of the date they are provided to the NHA. The documents must not be damaged, altered or in any way illegible.

Faxes and print-outs from web pages are considered original documents.

The NHA staff member who views the original document must make a photocopy, annotate the copy with the name of the person who provided the document and the date the original was viewed, and sign the copy, which is retained by the NHA.

Any family self-certifications must be made in a format acceptable to the NHA and must be signed in the presence of a NHA representative or any notary public.

7.E. SELF-CERTIFICATION

When information cannot be verified by a third party or by review of documents, family members will be required to submit self-certifications attesting to the accuracy of the information they have provided to the PHA.

NHA Policy

The NHA may require a family to certify that a family member does not receive a particular type of income or benefit.

The self-certification must be made in a format acceptable to the NHA and must be signed by the family member whose information or status is being verified. All self-certifications must be signed in the presence of a NHA representative or any notary public.

ACOP APPENDIX G REVISIONS

Current Policy

APPENDIX G: TRANSFER POLICY

A family may request a transfer for a move to another unit if it meets certain criteria as follows and will be processed in the following order of preference:

1. Emergencies as determined by the Executive Director and/or the Board of Commissioners including
 - i. an uninhabitable unit due to the action or inaction of the NHA or
 - ii. an 'act of God' disaster, or
 - iii. ordered or a stipulated judgment by a Court or Law Enforcement Agency and as approved by the Executive Director, or
 - iv. a barrier free unit occupied by a tenant who does not require the features and which are need by another tenant or an applicant being admitted.

Proposed Policy

APPENDIX G: TRANSFER POLICY

A family may request a transfer for a move to another unit. The family will be placed on the respective transfer list, if it meets certain criteria as follows and will be processed in the following order of preference:

1. Emergencies as determined by the Executive Director or designee including:
 - i. an uninhabitable unit due to the action or inaction of the NHA or
 - ii. an 'act of God' disaster, or
 - iii. ordered or a stipulated judgment by a Court or Law Enforcement Agency and as approved by the Executive Director, or
 - iv. a barrier free unit occupied by a tenant who does not require the features and which are need by another tenant or an applicant being admitted,
 - v. Due to a certified case of VAWA

**NORWALK HOUSING AUTHORITY
NORWALK, CONNECTICUT
ADMINISTRATIVE PLAN
FOR THE
HOUSING CHOICE VOUCHER (SECTION 8)
PROGRAM**

Rev. 9/20/11 Effective 4/1/2012

Resources and Where to Find Them

Following is a list of resources helpful to the PHA or referenced in the model administrative plan, and the online location of each.

Document and Location

OMB Circular A-133

Notice PIH 2010-3, Verification of Social Security Numbers (SSNs) and Supplemental Security Income (SSI) Benefits

<http://www.hud.gov/offices/pih/publications/notices/10/pih2010-3.pdf>

Notice PIH 2010-19, Administrative Guidance for Effective and Mandated Use of the Enterprise Income Verification (EIV) System

<http://www.hud.gov/offices/pih/publications/notices/10/pih2010-19.pdf> *Notice PIH 2010-26 (HA), Nondiscrimination and Accessibility*

Notice <http://www.hud.gov/offices/pih/publications/notices/10/pih2010-26.pdf>

<http://www.whitehouse.gov/omb/circulars/a133>

CHAPTER 2

2-II.D. VERIFICATION OF DISABILITY

The regulatory civil rights definition for persons with disabilities is provided in Exhibit 2-1 at the end of this chapter. **Medical records will not be accepted or retained in the participant file.**

- *In the event that the PHA does receive confidential information about a person's specific diagnosis, treatment, or the nature or severity of the disability, the PHA will dispose of it. In place of the information, the PHA will note in the file that the disability and other requested information have been verified, the date the verification was received, and the name and address of the knowledgeable professional who sent the information [Notice PIH 2010-26].*

2-II.E. APPROVAL/DENIAL OF A REQUESTED ACCOMMODATION [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act , [Notice PIH 2010-26](#)].

The PHA must approve a request for an accommodation if the following three conditions are met:

- The request was made by or on behalf of a person with a disability.
- There is a disability-related need for the accommodation.
- The requested accommodation is reasonable, meaning it would not impose an undue financial and administrative burden on the PHA, or fundamentally alter the nature of the PHA's HCV operations (including the obligation to comply with HUD requirements and regulations).

Requests for accommodations must be assessed on a case-by-case basis, taking into account factors such as the cost of the *overall size of the PHA's program with respect to the number of employees, type of facilities and size of budget, type of operation including composition and structure of workforce, the nature and cost of the* requested accommodation, , and the availability of alternative accommodations that would effectively meet the family's disability-related needs.

If the disability and the nexus to the disability are not obvious, NHA may require documentation of the manifestation of the disability that causes a need for specific reasonable accommodation. If the disability is not obvious before making a determination whether to approve the request, the PHA may enter into discussion and negotiation with the family, request more information from the family, or may require the family to sign a consent form so that the PHA may verify the need for the requested accommodation.

2-II.G. PHYSICAL ACCESSIBILITY

The PHA must comply with a variety of regulations pertaining to physical accessibility, including the following:

- PIH 2010-26
- Section 504 of the Rehabilitation Act of 1973
- The Americans with Disabilities Act of 1990
- The Architectural Barriers Act of 1968
- The Fair Housing Act of 1988

The PHA's policies concerning physical accessibility must be readily available to applicants and participants. They can be found in three key documents:

- This plan describes the key policies that govern the PHA's responsibilities with regard to physical accessibility.
- Notice PIH 2010-26 summarizes information about pertinent laws and implementing regulations related to non-discrimination and accessibility in federally-funded housing programs.
- The PHA Plan provides information about self-evaluation, needs assessment, and transition plans.

SEE SECTION ON "STEPS NHA HAS TAKEN TO ADDRESS IMPEDIMENTS TO FAIR HOUSING AND FURTHER FAIR HOUSING" IN THIS DOCUMENT

To the extent resources are available; the Housing Authority will take the following proactive steps in addressing accessibility problems for persons with disabilities;

(f) where requested by an individual, help program applicants and participants gain access to supportive services available within the community, but not require eligible applicants or participants to accept such supportive services as a condition of continued participation in the program;

(g) identify possible public and private funding sources to assist participants with disabilities in covering the costs of structural alterations and other accessibility features that are needed as accommodations for their disabilities;

(h) not deny other housing opportunities to persons who qualify for an HCV under this program, other housing opportunities, or otherwise restrict access to PHA programs to eligible applicants who choose not to participate;

(i) provide housing search assistance in accordance with 24 CFR Section 8.28(a)(3);

(j) In accordance with rent reasonableness requirements, approve higher rents to owners that provide accessible units with structural modifications for persons with disabilities (24 CFR Section 8.28(a)(5)); and

(k) provide technical assistance, through referrals to local fair housing and equal opportunity offices, to owners interested in making reasonable accommodations or units accessible to persons with disabilities.

The Housing Authority is committed to increasing affordable and accessible housing stock in the City of Norwalk as possible. To create opportunities for residents with disabilities to benefit from affordable housing, an internal Accommodation Review Committee was created in 2009 by the Housing Authority to review requests for accommodations. The Committee meets on an ongoing basis. All committee members have undergone training set forth in 2VB,2. The authorization to disclose health information was clarified to permit the knowledgeable professional to only advise NHA on the disability claimed, the requested accommodation and alternative accommodations

Further, we are committed to serving families with children and maintain five free after-school and summer Learning Centers to serve families with children. We are also committed to serving the Limited English Proficiency (LEP) population. Maintenance of affordable housing stock continues to be a priority and the agency continues to receive high ratings from the U.S. Department of Housing and Urban Development.

We will provide technical assistance, through referrals to local fair housing and equal opportunity offices and referrals to owners who have expressed an interest in making accommodations or units accessible to persons with disabilities.

We will also inform individuals on how to file a fair housing complaint including the provision of the toll-free numbers for the Fair Housing Complaint Hotline: 1-800-669-9777. Persons with hearing or speech impediments may access this number via TTY by calling the Federal Information Relay Service at 800-887-8339. We will also provide the Norwalk Fair Housing Officer's number: 203-854-7820 and address: 125 East Avenue, Room 202, Norwalk, CT 06856 and Norwalk Redevelopment Agency's number: 203-854-7810 and address: 125 East Avenue, Room 202, Norwalk, CT 06856.

The Fair Housing Officer and the Director of Human Relations and Fair Rent have been and will continue to be invited to participate in briefings.

We will also ask Section 8 landlords and local realtors at the annual Open House meeting to register with the Housing Authority if they have accessible units.

Chapter 3

3-I.C. FAMILY BREAK-UP AND REMAINING MEMBER OF TENANT FAMILY

Family Break-up [24 CFR 982.315]

*Except under the following conditions, the PHA has discretion to determine which members of an assisted family continue to receive assistance if the family breaks up. **If the family breakup results from an occurrence of domestic violence, dating violence, or stalking, the PHA must ensure that the victim retains assistance. (For documentation requirements and policies related to domestic violence, dating violence, and stalking, see section 16-IX.D of this plan.)***

However, if a court determines the disposition of property between members of the assisted family in a divorce or separation decree, the PHA is bound by the court's determination of which family members continue to receive assistance.

PHA Policy

Applicants: When a family on the waiting list breaks up into two otherwise eligible families, only one of the new families may retain the original application date. Other former family members may make a new application with a new application date if the waiting list is open.

Participants: If a family breaks up into two otherwise eligible families while receiving assistance, only one of the new families will continue to be assisted.

In the absence of a judicial decision, or an agreement among the original family members, NHA will determine which family will retain their placement on the waiting list, or continue to receive assistance. *In making its determination, the PHA will take into consideration the following factors:*

- (1) the interest of any minor children, including custody arrangements,
- (2) the interest of any ill, elderly, or disabled family members,
- (3) *the interest of any family member who is the victim of domestic violence, dating violence, or stalking, including a family member who was forced to leave an assisted unit as a result of such actual or threatened abuse*
- (4) the recommendations of social service professionals.

3-II.C. SOCIAL SECURITY NUMBERS [24 CFR 5.216 and 5.218 , *Notice PIH 2010-3*]

For every family member, the family must provide documentation of a valid Social Security Number (SSN). Assistance cannot be provided to a family until all SSN documentation requirements are met. A detailed discussion of acceptable documentation is provided in Chapter 7.

Note: These requirements do not apply to non-citizens who do not contend eligible immigration status.

If a new member, is added to the family, the new member's SSN documentation must be submitted at the family's interim or reexamination, whichever comes first. If any member of the family, has been assigned a new SSN, the documentation must be submitted within 10 business days. *Participants age 62 or older as of January 31, 2010, whose determination of eligibility was begun before January 31, 2010, are exempt from this requirement and remain exempt even if they move to a new assisted unit.*

The PHA must deny assistance to an applicant family if they do not meet the SSN disclosure, documentation and verification, and certification requirements contained in 24 CFR 5.216.

3-II.E. STUDENTS ENROLLED IN INSTITUTIONS OF HIGHER EDUCATION [24 CFR 5.612 and FR Notice 4/10/06]

Section 327 of Public Law 109-115 and the implementing regulation at 24 CFR 5.612 established new restrictions on the eligibility of certain students (both part- and full-time) who are enrolled in institutions of higher education.

If a student enrolled at an institution of higher education is under:

the age of 24,

is not a veteran,

is not married,

and does not have a dependent child,

and is not a person with disabilities receiving HCV assistance as of November 30, 2005,

the student's eligibility must be examined along with the income eligibility of the student's parents.

Definitions

Veteran

Person with Disabilities

The PHA will use the statutory definition under section 3(b)(3)(E) of the 1937 Act to determine whether a student is a person with disabilities (see Exhibit 3-1).

PHA Policy

A *veteran* is a person who served in the active military, naval, or air service and who was discharged or released from such service under conditions other than dishonorable.

Prohibited Reasons for Denial of Program Assistance [24 CFR 982.202(b), 24 CFR 5.2005(b)]

HUD rules prohibit denial of program assistance to the program based on any of the following criteria:

- Age, disability, race, color, religion, sex, or national origin. (See Chapter 2 for additional information about fair housing and equal opportunity requirements.)
- Where a family lives prior to admission to the program
- Where the family will live with assistance under the program. Although eligibility is not affected by where the family will live, there may be restrictions on the family's ability to move outside the PHA's jurisdiction *under portability*. (See Chapter 10, .)
- Whether members of the family are unwed parents, recipients of public assistance, or children born out of wedlock
- Whether the family includes children
- Whether a family decides to participate in a family self-sufficiency program
- Whether or not a qualified applicant is or has been a victim of domestic violence, dating violence, or stalking if the applicant is otherwise qualified for assistance (See Section 3-III.G.)

Screening for Suitability as a Tenant [24 CFR 982.307]

The PHA has no liability or responsibility to the owner for the family's behavior or suitability for tenancy. The PHA may opt to conduct additional screening to determine whether an applicant is likely to be a suitable tenant.

PHA Policy

NHA **will not** conduct additional screening to determine an applicant family's suitability for tenancy.

The owner is responsible for screening and selection of the family to occupy the owner's unit. The PHA must inform the owner that screening and selection for tenancy is the responsibility of the owner.

An owner may consider a family's history with respect to factors such as: payment of rent and utilities, caring for a unit and premises, respecting the rights of other residents to the peaceful enjoyment of their housing, criminal activity that is a threat to the health, safety or property of others, and compliance with other essential conditions of tenancy.

HUD requires the PHA to provide prospective owners with the family's current and prior address (as shown in PHA records) and the name and address (if known) of the owner at the family's current and prior addresses. HUD permits the PHA to provide owners with additional

information, as long as families are notified that the information will be provided, and the same type of information is provided to all owners. The PHA may not disclose to the owner any confidential information provided in response to a PHA request for documentation of domestic violence, dating violence, or stalking except at the written request or with the written consent of the individual providing the documentation, [24 CFR 5.2007(a)(4)].

3-III.G. PROHIBITION AGAINST DENIAL OF ASSISTANCE TO VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, AND STALKING

The Violence against Women Act of 2005 (VAWA) and the HUD regulation at 24 CFR 5.2005(b) prohibit PHA's from denying an applicant admission to the HCV program on the basis that the applicant is or has been a victim of domestic violence, dating violence, or stalking if the applicant otherwise qualifies for assistance or admission.

Definitions of key terms used in VAWA are provided in section 16-IX of this plan, where general VAWA requirements and policies pertaining to notification, documentation, and confidentiality are also located.

Notification

PHA Policy

NHA acknowledges that a victim of domestic violence, dating violence, or stalking may have an unfavorable history that would warrant denial under NHA's policies.

Therefore, if NHA makes a determination to deny assistance to an applicant family, NHA will include in its notice of denial *the VAWA information described in section 16-IX.C of this plan and will request that an applicant wishing to claim protection under VAWA notify the PHA within 10 business days.*

DOCUMENTATION

Victim Documentation [24 CFR 5.2007]

PHA Policy

If an applicant claims the protection against denial of assistance that VAWA provides to victims of domestic violence, dating violence, or stalking, the PHA will request in writing that the applicant provide documentation supporting the claim in accordance with section 16-IX.D of this plan.

Perpetrator Documentation

PHA Policy

In cases where an applicant family includes the perpetrator as well as the victim of domestic violence, dating violence, or stalking, the applicant must provide additional documentation consisting of one of the following:

A signed statement (1) requesting that the perpetrator be removed from the application and (2) certifying that the perpetrator will not be permitted to visit or to stay as a guest in the assisted unit

Documentation that the perpetrator has successfully completed, or is successfully undergoing, rehabilitation or treatment. The documentation must be signed by an employee or agent of a domestic violence service provider or by a medical or other knowledgeable professional from whom the perpetrator has sought or is receiving assistance in addressing the abuse. The signer must attest under penalty of perjury to his or her belief that the rehabilitation was successfully completed or is progressing successfully. The victim and perpetrator must also sign or attest to the documentation.

Chapter 4

4-I.B. APPLYING FOR ASSISTANCE [HCV GB, pp. 4-11 – 4-16 , Notice PIH 2009-36]

Any family that wishes to receive HCV assistance must apply for admission to the program. HUD permits the PHA to determine the format and content of HCV applications, as well how such applications will be made available to interested families and how applications will be accepted by the PHA. However, the PHA must include Form HUD-92006, Supplement to Application for Federally Assisted Housing, as part of the PHA's application.

Chapter 5

Additional Items to be Included in the Briefing Packet

In addition to items required by the regulations, PHAs may wish to include supplemental materials to help explain the program to both participants and owners [HCV GB p. 8-7 , Notice PIH 21010-19].

PHA Policy

NHA will provide the following additional materials in the briefing packet:

When NHA-owned units are available for lease, a written statement that the family has the right to select any eligible unit available for lease, and is not obligated to choose a NHA-owned unit.

Information on how to fill out and file a housing discrimination complaint form .

[Information about the protections afforded by the Violence against Women Act of 2005 \(VAWA\) to victims of domestic violence, dating violence, and stalking \(see section 16-IX.C\)](#)

The publication, "Is Fraud Worth It?" (*HUD-1141-OIG*) that explains the types of actions a family must avoid and the penalties for program abuse.

"What You Should Know about EIV," a guide to the Enterprise Income Verification (EIV) system published by HUD as an attachment to Notice PIH 2010-19

Family Obligations [24 CFR 982.551]

Serious and repeated lease violations will include, but not be limited to: nonpayment of rent, disturbance of neighbors, destruction of property, or living or housekeeping habits that cause damage to the unit or premises and drug-related criminal activity or violent criminal activity. Generally, the criterion to be used will be whether or not the reason for the eviction was the fault of the tenant or guests. [Any incidents of, or criminal activity related to, domestic violence, dating violence, or stalking will not be construed as serious or repeated lease violations by the victim \[24 CFR 5.2005\(c\)\(1\)\].](#)

- Any live-in aide (approved by the PHA to reside in the unit to care for a family member who is disabled or is at least 50 years of age) must be counted in determining the family unit size;
- Unless a live-in-aide resides with a family, the family unit size for any family consisting of a single person must be either a zero- or one-bedroom unit, as determined under the PHA subsidy standards.

PHA Policy

NHA will assign one bedroom for each two persons within the household, except in the following circumstances:

Persons of the opposite sex (other than spouses, and children under age 2) will be allocated separate bedrooms.

Live-in aides will be allocated a separate bedroom, no additional bedrooms will be provided for the family members of the live-in aide.

Single person families will be allocated one bedroom, but may lease a studio.

Chapter 7

VERIFICATION

[24 CFR 982.516, 24 CFR 982.551, 24 CFR 5.230]

INTRODUCTION

The PHA must verify all information that is used to establish the family's eligibility and level of assistance and is required to obtain the family's consent to collect the information. Applicants and program participants must cooperate with the verification process as a condition of receiving assistance. The PHA must not pass on the cost of verification to the family.

The PHA will follow the verification guidance provided by HUD in PIH Notice 2 2010-19 and any subsequent guidance issued by HUD. This chapter summarizes those requirements and provides supplementary PHA policies.

Part I describes the general verification process. More detailed requirements related to individual factors are provided in subsequent parts including family information (Part II), income and assets (Part III), and mandatory deductions (Part IV).

Verification policies, rules and procedures will be modified as needed to accommodate persons with disabilities. All information obtained through the verification process will be handled in accordance with the records management policies of the PHA.

This chapter describes HUD regulations and PHA policies related to verification of all information that is used to establish the family's eligibility and level of assistance as follows:

Part I: General Verification Requirements

Part II: Verifying Family Information

Part III: Verifying Income and Assets

Part IV: Verifying Mandatory Deductions

The PHA must follow Notice PIH 2010-19 Administrative Guidance and this chapter summarizes those requirements and provides supplementary PHA policies

7-I.B. OVERVIEW OF VERIFICATION REQUIREMENTS

HUD's Verification Hierarchy

HUD authorizes the PHA to use six levels to verify family information and specifies the circumstances in which each method will be used. In general HUD requires the PHA to use the most reliable form of verification that is available and to document the reasons when the PHA uses a lesser form of verification.

PHA Policy

In order of priority, the forms of verification that NHA will use are:

- Up-front Income Verification (UIV) using HUD's Enterprise Income Verification (EIV) system

- Up-front Income Verification (UIV) using non-HUD systems

- Third-party Written Verification

- Third-party Written Verification Form

- Third-party Oral Verification Form Self-Certification/Tenant Declaration

Each of the verification methods is discussed in subsequent sections below. **Requirements for Acceptable Documents**

PHA Policy

Any documents used for verification must be the original (not photocopies) and generally must be dated within 60 calendar days of the date they are provided to NHA. The documents must not be damaged, altered or in any way illegible. NHA will accept documents dated up to 6 months before the effective date of the family's reexamination if the document represents the most recent scheduled report from a source. For example, if the holder of a pension annuity provides semi-annual reports, NHA would accept the most recent report. Print-outs from web pages are considered original documents.

The NHA staff member who views the original document must make a photocopy, annotate the copy with the name of the person who provided the document and the date the original was viewed, and sign the copy.

Any family self-certifications must be made in a format acceptable to NHA and must be signed in the presence of a NHA representative or notary public.

File Documentation

The PHA must document in the file how the figures used in income and rent calculations were determined. All verification attempts, information obtained, and decisions reached during the verification process will be recorded in the family's file in sufficient detail to demonstrate that the PHA has followed all of the verification policies set forth in this plan. The record should be sufficient to enable a staff member or HUD reviewer to understand the process followed and conclusions reached.

7-I.C. UP-FRONT INCOME VERIFICATION (UIV) (Level 6/5)

Up-front income verification (UIV) refers to the PHA's use of the verification tools available from independent sources that maintain computerized information about earnings and benefits. UIV will be used to the extent that these systems are available to the PHA.

PHA Policy

NHA will inform all applicants and participants of its use of the following UIV resources during the admission and reexamination process:

HUD's EIV system (when available to NHA) which includes: earned income, unemployment benefits, Social Security and SSI benefits

TANF, The Work Number, , Veteran's, Child Support, Pension, Worker's/Dis.Compensation, and Educational Asst.

The PHA must restrict access to and safeguard UIV data in accordance with HUD guidance on security procedures, as issued and made available by HUD.

There may be legitimate differences between the information provided by the family and UIV-generated information. No adverse action can be taken against a family until the PHA has independently verified the UIV information and the family has been granted an opportunity to contest any adverse findings through the informal review/hearing process of the PHA.

7-I.D. THIRD-PARTY WRITTEN VERIFICATION *(Level 4)*

HUD's current verification hierarchy defines two types of written third-party verification. The more preferable form, "written third-party verification," consists of an original document generated by a third-party source, which may be provided to the PHA by the family. If written third-party verification is not available, the PHA must attempt to obtain a "written third-party verification form." This is a standardized form used to collect information from a third party.

PHA Policy

NHA will diligently seek third-party verification using a combination of written and oral requests to verification sources. Information received orally from third parties may be used either to clarify information provided in writing by the third party or as independent verification when written third-party verification is not received in a timely fashion.

NHA may mail, fax, e-mail, or hand deliver third-party written verification requests and will accept third-party responses using any of these methods. NHA will send a written request for verification to each required source within five (5) business days of securing a family's authorization for the release of the information and give the source ten (10) business days to respond in writing. If a response has not been received by the 11th business day, NHA will request third-party oral verification.

NHA will make a minimum of two attempts, one of which may be oral, to obtain third-party verification. A record of each attempt to contact the third-party source (including no-answer calls) and all contacts with the source will be documented in the file.

Regarding third-party oral verification, NHA staff will record in the family's file the name and title of the person contacted, the date and time of the conversation (or attempt), the telephone number used, and the facts provided.

When any source responds verbally to the initial written request for verification NHA will accept the verbal response as oral verification but will also request that the source complete and return any verification forms that were provided.

If a third party agrees to confirm in writing the information provided orally, NHA will wait no more than five (5) business days for the information to be provided. If the

information is not provided by the 6th business day, NHA will use any information provided orally in combination with reviewing family-provided documents.

When Third-Party Information is Late

When third-party verification form has been requested and the timeframes for submission have been exceeded, the PHA will use tenant declaration. If the PHA later receives third-party verification that differs from the amounts used in income and rent determinations and it is past the deadline for processing the reexamination, the PHA will conduct an interim reexamination to adjust the figures used for the reexamination, regardless of the PHA's interim reexamination policy.

Exceptions to third-party verification requirements

Oftentimes, the PHA may have made numerous attempt to obtain the required verifications with no success, or it may not be cost effective to obtain third party verification of income, assets, or expenses, when the impact on total tenant payment is minimal. In these cases, the PHA is required to document in the family file the reason(s) why third party verification was not available.

Primary Documents

Third-party verification is not required when legal documents are the primary source, such as a birth certificate or other legal documentation of birth.

Certain Assets and Expenses

The PHA will accept a self-certification from a family as verification of assets disposed of for less than fair market value [HCV GB, p. 5-28].

The PHA will determine that third-party verification **form** is not available if the asset or expense involves an insignificant amount, making it not cost-effective or reasonable to obtain third-party verification [VG, p. 15].

Certain Income, Asset and Expense Sources

The PHA will determine that third-party verification is not available when it is known that an income source does not have the ability to provide written or oral third-party verification [VG, p. 15].

For example, the PHA will rely upon **self-certification** when the PHA determines that a third party's privacy rules prohibit the source from disclosing information.

PHA Policy

If the family cannot provide original documents, NHA will pay the service charge required to obtain third-party verification, unless it is not cost effective in which case a self-certification will be acceptable as the only means of verification. The cost of verification will not be passed on to the family.

The cost of postage and envelopes to obtain third-party verification of income, assets, and expenses is not an unreasonable cost [VG, p. 18].

When the PHA is required to request written third party verification.

The PHA must request written third party verification under the following circumstances:

- a. When the tenant disputes the EIV information and is unable to provide acceptable documentation to support his/her dispute (24 CFR S5.236(b))*
- b. When the PHA requires additional information that is not available in EIV and/or the tenant is unable to provide the PHA with current acceptable tenant-provided documentation.*

7-I.F. SELF-CERTIFICATION/TENANT DECLARATION (Level 1)

The tenant submits an affidavit or notarized statement of reported income and/or expenses to the PHA. The PHA must document in the tenant file why third party was not available.

PHA Policy

When information cannot be verified by a third party document or third-party form, family members will be required to submit self-certifications attesting to the accuracy of the information they have provided to NHA.

NHA may require a family to certify that a family member does not receive a particular type of income or benefit.

The self-certification must be made in a format acceptable to NHA and must be signed by the family member whose information or status is being verified.

All self-certifications must be signed in the presence of a NHA representative or notary public.

7-II.B. SOCIAL SECURITY NUMBERS [24 CFR 5.216 and Notice PIH 2010-3]

The family must provide documentation of a valid social security number (SSN) for each member of the household, with the exception of individuals who do not contend eligible immigration status. Exemptions also include, existing program participants who were at least 62 years of age as of January 31, 2010, and had not previously disclosed an SSN.

PHA Policy

NHA will accept the following as evidence of a SSN:

- a. an original SSN card issued by SSA**
- b. an original SSA-issued document, which contains the name and SSN of the individual, or**

c. an original document issued by a federal, state, or local government agency, which contains the name and SSN of the individual.

If the family reports an SSN but cannot provide acceptable documentation of the number, the PHA will require a self-certification stating that documentation of the SSN cannot be provided at this time. The PHA will require documentation of the SSN within 60 calendar days from the date of the family member's self-certification mentioned above. If the family is an applicant, assistance cannot be provided until proper documentation of the SSN is provided.

PHA Policy

NHA will use the EIV system to verify SSN's. NHA may confirm HUD's validation of the participant's SSN by viewing the household's Summary Report or the Identity Verification Report in the EIV system.

For individuals who are at least 62 years of age and are unable to submit the required documentation of their SSN within the initial 30-day period, NHA will grant an additional 30 calendar days to provide documentation.

Social security numbers must be verified only once during continuously-assisted occupancy.

If any family member obtains an SSN after admission to the program, the new SSN must be disclosed at the next regularly scheduled reexamination.

The social security numbers of household members, such as live-in aids, must be verified for the purpose of conducting criminal background checks.

Minor Children

NHA Policy

If the family wishes to add a minor child who is not related to the head of household by birth or adoption, they must provide verification of legal custody/guardianship by providing one of the following:

Court order Verification from social services agency
Notarized statement of parent
School records

Remove Exhibit 7-1

Chapter 8

Units that Must Not be Used as Comparables

Comparable units must represent unrestricted market rents. Therefore, units that receive some form of federal, state, or local assistance that imposes rent restrictions cannot be considered comparable units.

These include units assisted by HUD through any of the following programs:

Section 8 project-based assistance, Section 236 and Section 221(d)(3) Below Market Interest Rate (BMIR) projects, HOME or Community Development Block Grant (CDBG) program-assisted units in which the rents are subsidized; units subsidized through federal, state, or local tax credits; units subsidized by the Department of Agriculture rural housing programs, and units that are rent-controlled by local ordinance.

Note: Notice PIH 2010-18, issued May 10, 2010, provides further guidance on the issue of what constitutes an assisted unit.

Chapter 9

9-I.A. TENANT SCREENING

The PHA has no liability or responsibility to the owner or other persons for the family's behavior or suitability for tenancy [24 CFR 982.307(a)(1)].

The PHA may elect to screen applicants for family behavior or suitability for tenancy. See Chapter 3 for a discussion of the PHA's policies with regard to screening applicant families for program eligibility [24 CFR 982.307(a)(1)].

The owner is responsible for screening and selection of the family to occupy the owner's unit. At or before PHA approval of the tenancy, the PHA must inform the owner that screening and selection for tenancy is the responsibility of the owner [24 CFR 982.307(a)(2)]. The PHA must also inform the owner or manager of his/her rights and obligations under the Violence against Women Act of 2005 (VAWA) [24 CFR 5.2005(a)(2)]

The PHA must provide the owner with the family's current and prior address (as shown in the PHA records); and the name and address (if known to the PHA) of the landlord at the family's current and prior address. [24 CFR 982.307 (b)(1)].

The PHA is permitted, but not required, to offer the owner other information in the PHA's possession about the family's tenancy [24 CFR 982.307(b)(2)].

The PHA's policy on providing information to the owner must be included in the family's briefing packet [24 CFR 982.307(b)(3)]. [The PHA may not disclose to the owner any confidential information provided in response to a PHA request for documentation of domestic violence, dating violence, or stalking except at the written request or with the written consent of the individual providing the documentation \[24 CFR 5.2007\(b\)\(4\)\].](#)

PHA Policy

NHA will not screen applicants for family behavior or suitability for tenancy.

NHA will not provide additional screening information to the owner.

Chapter 10

PART I: MOVING WITH CONTINUED ASSISTANCE

10-I.A. ALLOWABLE MOVES

HUD lists six regulatory conditions under which an assisted family is allowed to move to a new unit with continued assistance.

Permission to move is subject to the restrictions set forth in section 10-I.B.

- The family has a right to terminate the lease on notice to the owner (for the owner's breach or otherwise) and has given a notice of termination to the owner in accordance with the lease [24 CFR 982.314(b)(3)]. If the family terminates the lease on notice to the owner, the family must give the PHA a copy of the notice at the same time [24 CFR 982.314(d)(1)].
- The lease for the family's unit has been terminated by mutual agreement of the owner and the family [24 CFR 982.314(b)(1)(ii)].

PHA Policy

If the family and the owner mutually agree to terminate the lease for the family's unit, the family must give NHA a copy of the termination agreement. Note: Not available during initial year.

The owner has given the family a notice to vacate, has commenced an action to evict the family, or has obtained a court judgment or other process allowing the owner to evict the family [24 CFR 982.314(b)(2)]. The family must give the PHA a copy of any owner eviction notice [24 CFR 982.551(g)]. *The family or a member of the family is or has been the victim of domestic violence, dating violence, or stalking and the move is needed to protect the health or safety of the family or family member [24 CFR 982.314(b)(4)]. This condition applies even when the family has moved out of its unit in violation of the lease, with or without prior notification to the PHA, if the family or family member who is the victim reasonably believed that he or she was imminently threatened by harm from further violence if he or she remained in the unit [24 CFR 982.314(b)(4), 24 CFR 982.353(b)].*

NHA Policy

If a family requests permission to move with continued assistance based on a claim that the move is necessary to protect the health or safety of a family member who is or has been the victim of domestic violence, dating violence, or stalking, NHA will request documentation in accordance with section 16-IX.D of this plan. NHA reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the family or family member will suffice. In such cases, NHA will document the waiver in the family's file.

- The PHA has terminated the assisted lease for the family's unit for the owner's breach [24 CFR 982.314(b)(1)(i)].
- The PHA determines that the family's current unit does not meet the HQS space standards because of an increase in family size or a change in family composition. In such cases, the

PHA must issue the family a new voucher, and the family and PHA must try to find an acceptable unit as soon as possible. If an acceptable unit is available for the family, the PHA must terminate the HAP contract for the family's old unit in accordance with the HAP contract terms and must notify both the family and the owner of the termination. The HAP contract terminates at the end of the calendar month that follows the calendar month in which the PHA gives notice to the owner. [24 CFR 982.403(a) and (c)]

10-I.B. RESTRICTIONS ON MOVES

A family's right to move is generally contingent upon the family's compliance with program requirements [24 CFR 982.1(b)(2)]. HUD specifies two conditions under which a PHA may deny a family permission to move and two ways in which a PHA may restrict moves by a family.

Denial of Moves

HUD regulations permit the PHA to deny a family permission to move under the following conditions:

Insufficient Funding

The PHA may deny a family permission to move *either within or outside the PHA's jurisdiction* if the PHA does not have sufficient funding for continued assistance [24 CFR 982.314(e)(1)]. *However, Notice PIH 2011-3 significantly restricts the ability of PHA's to deny permission to move due to insufficient funding and places further requirements on PHA's regarding moves denied due to lack of funding. The requirements found in this notice are mandatory.*

PHA Policy

NHA will deny a family permission to move on grounds that NHA does not have sufficient funding for continued assistance if

- (a) the move is initiated by the family, not the owner or NHA;
- (b) NHA can demonstrate that the move will, in fact, result in higher subsidy costs; and
- (c) NHA can demonstrate, in accordance with the policies in Part VIII of Chapter 16, that it does not have sufficient funding in its annual budget to accommodate the higher subsidy costs.

NHA will create a list of families whose moves have been denied due to insufficient funding. When funds become available, the families on this list will take precedence over families on the waiting list. The PHA will use the same procedures for notifying families with open requests to move when funds become available as it uses for notifying families on the waiting list (see section 4-III.D).

NHA will inform the family of its policy regarding moves denied due to insufficient funding in a letter to the family at the time the move is denied.

Grounds for Denial or Termination of Assistance

The PHA may deny a family permission to move if it has grounds for denying or terminating the family's assistance [24 CFR 982.314(e)(2)].

PHA Policy

If NHA has grounds for denying or terminating a family's assistance, NHA will act on those grounds in accordance with the regulations and policies set forth in Chapters 3 and 12, respectively. The participant must provide landlord documentation that he/she is in good standing before a voucher to move will be issued.

Restrictions on Elective Moves [24 CFR 982.314(c)]

HUD regulations permit the PHA to prohibit any elective move by a participant family during the family's initial lease term. They also permit the PHA to prohibit more than one elective move by a participant family during any 12-month period. *However, such prohibitions, if adopted, do not apply when the family or a member of the family is or has been the victim of domestic violence, dating violence, or stalking and the move is needed to protect the health or safety of the family or family member. (For the policy on documentation of abuse, see section 10-I.A.)*

PHA Policy

NHA will deny a family permission to make an elective move during the family's initial lease term. This policy applies to moves within NHA's jurisdiction or outside it under portability.

NHA will also deny a family permission to make more than one elective move during any twelve (12)-month period. This policy applies to all assisted families residing in NHA's jurisdiction.

NHA will consider exceptions to these policies for the following reasons: to protect the health or safety of a family member (e.g., lead-based paint hazards, domestic violence, witness protection programs), to accommodate a change in family circumstances (e.g., new employment, school attendance in a distant area), or to address an emergency situation over which a family has no control. This generally does not apply to a pre-existing medical condition.

In addition, the PHA will allow exceptions to these policies for purposes of reasonable accommodation of a family member who is a person with disabilities (see Chapter 2).

10-I.C. MOVING PROCESS

Notification

If a family wishes to move to a new unit, the family must notify the PHA and the owner before moving out of the old unit or terminating the lease on notice to the owner [24 CFR 982.314(d)(2)].

If the family wishes to move to a unit outside the PHA's jurisdiction under portability, the notice to the PHA must specify the area where the family wishes to move [24 CFR 982.314(d)(2), **Notice PIH 2011-3**].

The notices must be in writing [24 CFR 982.5].

Approval

PHA Policy

Upon receipt of a family's notification that it wishes to move, NHA will determine whether the move is approvable in accordance with the regulations and policies set forth in sections 10-I.A and 10-I.B. The participant must provide landlord documentation that he/she is in good standing before a voucher to move will be issued.

NHA will notify the family in writing of its determination within ten (10) business days following receipt of the family's notification.

Applicant Families

Under HUD regulations, most applicant families qualify to lease a unit outside the PHA's jurisdiction under portability. However, HUD gives the PHA discretion to deny a portability move by an applicant family for the same two reasons that it may deny any move by a participant family: insufficient funding and grounds for denial or termination of assistance.

PHA Policy

In determining whether or not to deny an applicant family permission to move under portability because the PHA lacks sufficient funding or has grounds for denying assistance to the family, the initial PHA will follow the policies established in section 10-I.B of this chapter.

In addition, the PHA may establish a policy denying the right to portability to nonresident applicants during the first twelve (12) months after they are admitted to the program [24 CFR 982.353(c)].

PHA Policy

If neither the head of household nor the spouse/cohead of an applicant family has a domicile (legal residence) in NHA's jurisdiction at the time of the family's HCV issuance, the family must live in NHA's jurisdiction with housing choice voucher assistance for at least twelve (12) months before receiving portability.

NHA will consider exceptions to this policy for purposes of reasonable accommodation, **or reasons related to domestic violence, dating violence, or stalking** (VAWA) or Witness Protection. (see Chapter 2). However, any exception to this policy is subject to the approval of the receiving PHA [24 CFR 982.353(c)(3)].

Participant Families

The Initial PHA must not provide portable assistance for a participant if a family has moved out of its assisted unit in violation of the lease [24 CFR 982.353(b)]. **The Violence against Women Act of 2005 (VAWA)** creates an exception to this prohibition for families who are otherwise in compliance with program obligations but have moved to protect the health or safety of a **family member** who is or has been a victim of domestic violence, dating violence or stalking and who

reasonably believed **he or she** was imminently threatened by harm from further violence if he or she remained in the unit. **[24 CFR 982.353(b)]**

Determining Income Eligibility

Applicant Families

An applicant family may lease a unit in a particular area under portability only if the family is income eligible for admission to the voucher program in that area [24 CFR 982.353(d)(3)]. The family must specify the area to which the family wishes to move [Notice 2011-3].

The initial PHA is responsible for determining whether the family is income eligible in the area to which the family wishes to move [24 CFR 982.355(c)(1)]. If the applicant family is not income eligible in that area, the PHA must inform the family that it may not move there and receive voucher assistance **[Notice PIH 2011-3]**.

Participant Families

The income eligibility of a participant family is not redetermined if the family moves to a new jurisdiction under portability [24 CFR 982.353(d)(2), 24 CFR 982.355(c)(1)].

Preapproval Contact with the Receiving PHA

Prior to approving a family's request to move under portability, the initial PHA must contact the receiving PHA via e-mail or other confirmed delivery method to determine whether the receiving PHA will administer or absorb the family's voucher. Based on the receiving PHA's response, the initial PHA must determine whether it will approve or deny the move [Notice PIH 2011-3].

PHA Policy

NHA will use e-mail, when possible, to contact the receiving PHA regarding whether the receiving PHA will administer or absorb the family's voucher.

Initial Notifications to the Receiving PHA

After approving a family's request to move under portability, the initial PHA must promptly notify the receiving PHA to expect the family [24 CFR 982.355(c)(2)]. This means that the initial PHA must contact the receiving PHA directly on the family's behalf **[Notice PIH 2011-3]**. The initial PHA must also advise the family how to contact and request assistance from the receiving PHA [24 CFR 982.355(c)(2)].

PHA Policy

Because the portability process is time-sensitive, NHA will notify the receiving PHA by phone, fax, or e-mail to expect the family.

NHA will also ask the receiving PHA to provide any information the family may need upon arrival, including the name, fax, email and telephone number of the staff person responsible for business with incoming portable families and procedures related to appointments for voucher issuance. NHA will pass this information along to the family.

NHA will also ask for the name, address, telephone number, fax and email of the person responsible for processing the billing information.

Sending Documentation to the Receiving PHA

The initial PHA is required to send the receiving PHA the following documents:

- Form HUD-52665, Family Portability Information, with Part I filled out [Notice PIH 2011-3]
- A copy of the family's voucher [Notice PIH 2011-3]
- A copy of the family's most recent form HUD-50058, Family Report, or, if necessary in the case of an applicant family, family and income information in a format similar to that of form HUD-50058 [24 CFR 982.355(c)(4), Notice PIH 2011-3]
- Copies of the income verifications backing up the form HUD-50058 [24 CFR 982.355(c)(4), Notice PIH 2011-3]

PHA Policy

NHA will not provide additional information. to the receiving PHA:

Initial Billing Deadline [Notice PIH 2011-3]

When the initial PHA sends form HUD-52665 to the receiving PHA, it specifies in Part I the deadline by which it must receive the initial billing notice from the receiving PHA. This deadline is 60 days following the expiration date of the voucher issued to the family by the initial PHA.

If the initial PHA does not receive a billing notice by the deadline and does not intend to honor a late billing submission, it must contact the receiving PHA to determine the status of the family.

If the receiving PHA reports that the family is not yet under HAP contract, the initial PHA may refuse to accept a late billing submission. If the receiving PHA reports that the family is under HAP contract and the receiving PHA cannot absorb the family, the initial PHA must accept a late billing submission; however, it may report to HUD the receiving PHA's failure to comply with the deadline.

Monthly Billing Payments [24 CFR 982.355(e), Notice PIH 2011-3]

If the receiving PHA is administering the family's voucher, the initial PHA is responsible for making billing payments in a timely manner.

The first billing amount is due within thirty (30) calendar days after the initial PHA receives Part II of form HUD-52665 from the receiving PHA.

Subsequent payments must be **received** by the receiving PHA no later than the fifth business day of each month. The payments must be provided in a form and manner that the receiving PHA is able and willing to accept.

The initial PHA may not terminate or delay making payments under existing portability billing arrangements as a result of overleasing or funding shortfalls. The PHA must manage its tenant-based program in a manner that ensures that it has the financial ability to provide assistance for

families that move out of its jurisdiction under portability and are not absorbed by receiving PHAs as well as for families that remain within its jurisdiction.

PHA Policy

NHA will make payments by check or direct deposit so that the payment is received by the deadline. If the receiving PHA notifies NHA that direct deposit is not acceptable to them, a check will be issued.

Responding to Initial PHA's Request

The receiving PHA must respond via e-mail or other confirmed delivery method to the initial PHA's inquiry to determine whether the family's voucher will be billed or absorbed. If the receiving PHA informs the initial PHA that it will be absorbing the voucher, the receiving PHA cannot reverse its decision at a later date [Notice PIH 2011-3].

PHA Policy

NHA will use e-mail, when possible, to notify the initial PHA whether it will administer or absorb the family's voucher.

Initial Contact with Family

When a family moves into the PHA's jurisdiction under portability, the family is responsible for promptly contacting the PHA and complying with the PHA's procedures for incoming portable families [24 CFR 982.355(c)(3)].

If the voucher issued to the family by the initial PHA has expired, the receiving PHA does not process the family's paperwork but instead refers the family back to the initial PHA [Notice PIH 2011-3].

If for any reason the receiving PHA refuses to process or provide assistance to a family under the portability procedures, the family must be given the opportunity for an informal review or hearing [Notice PIH 2011-3].

(For more on this topic, see later under "Denial or Termination of Assistance.")

Briefing

HUD allows the receiving PHA to require a briefing for an incoming portable family as long as the requirement does not unduly delay the family's search [Notice PIH 2011-3].

PHA Policy

NHA will not require the family to attend a briefing. NHA will provide the family with a briefing packet (as described in Chapter 5) and, in an individual briefing, will orally inform the family about NHA's payment and subsidy standards, procedures for requesting approval of a unit, the unit inspection process, and the leasing process.

NHA will suggest that the family attend a full briefing at a later date.

Income Eligibility and Reexamination

HUD allows the receiving PHA to conduct its own income reexamination of a portable family [24 CFR 982.355(c)(4)]. However, the receiving PHA may not delay voucher issuance or unit approval until the reexamination process is complete unless the reexamination is necessary to determine that an applicant family is income eligible for admission to the program in the area where the family wishes to lease a unit [Notice PIH 2011-3, 24 CFR 982.201(b)(4)].

The receiving PHA does not redetermine income eligibility for a portable family that was already receiving assistance in the initial PHA's voucher program [24 CFR 982.355(c)(1)].

PHA Policy

For any family moving into its jurisdiction under portability, NHA will conduct a new reexamination of family income and composition. However, NHA will not delay issuing the family a voucher for this reason. Nor will NHA delay approving a unit for the family until the reexamination process is complete unless the family is an applicant and NHA cannot otherwise confirm that the family is income eligible for admission to the program in the area where the unit is located.

In conducting its own reexamination, NHA will rely upon any verifications provided by the initial PHA to the extent that they

- (a) accurately reflect the family's current circumstances and
- (b) were obtained within the last 120 days.

Any new information may be verified by documents provided by the family and adjusted, if necessary, when third party verification is received.

Voucher Issuance

When a family moves into its jurisdiction under portability, the receiving PHA is required to issue the family a voucher [24 CFR 982.355(b)(6)]. The family must submit a request for tenancy approval to the receiving PHA during the term of the receiving PHA's voucher [24 CFR 982.355(c)(6)].

Timing of Voucher Issuance

HUD expects the receiving PHA to issue the voucher within two weeks after receiving the family's paperwork from the initial PHA if the information is in order, the family has contacted the receiving PHA, and the family complies with the receiving PHA's procedures [Notice PIH 2011-3].

PHA Policy

When a family ports into its jurisdiction, NHA will issue the family a voucher based on the paperwork provided by the initial PHA unless the family's paperwork from the initial PHA is incomplete, the family's housing choice voucher from the initial PHA has expired or the family does not comply with the PHA's procedures.

NHA will update the family's information when verification has been completed.

Voucher Term

The term of the receiving PHA's voucher may not expire before the term of the initial PHA's voucher [24 CFR 982.355(c)(6)].

PHA Policy

NHA's voucher will expire on the same date as the initial PHA's voucher.

Voucher Extensions [24 CFR 982.355(c)(6), Notice 2011-3]

The receiving PHA may provide additional search time to the family beyond the expiration date of the initial PHA's voucher; however, if it does so, it must inform the initial PHA of the extension. It must also bear in mind the billing deadline provided by the initial PHA. Unless willing and able to absorb the family, the receiving PHA should ensure that any voucher expiration date would leave sufficient time to process a request for tenancy approval, execute a HAP contract, and deliver the initial billing to the initial PHA.

PHA Policy

NHA will not extend the term of the voucher that it issues to an incoming portable family, unless NHA plans to absorb the family.

NHA will consider an exception to this policy as a reasonable accommodation to a person with disabilities (see Chapter 2).

Notifying the Initial PHA

The receiving PHA must promptly notify the initial PHA if the family has leased an eligible unit under the program or if the family fails to submit a request for tenancy approval for an eligible unit within the term of the receiving PHA's voucher [24 CFR 982.355(c)(8)].

The receiving PHA is required to use Part II of form HUD-52665, Family Portability Information, for this purpose [24 CFR 982.355(e)(5), Notice PIH 2011-3].

(For more on this topic and the deadline for notification, see below under "Administering a Portable Family's Voucher,")

If an incoming portable family ultimately decides not to lease in the jurisdiction of the receiving PHA but instead wishes to return to the initial PHA's jurisdiction or to search in another jurisdiction, the receiving PHA must refer the family back to the initial PHA.

In such a case the voucher of record for the family is once again the voucher originally issued by the initial PHA. Any extension of search time provided by the receiving PHA's voucher is only valid for the family's search in the receiving PHA's jurisdiction. [Notice PIH 2011-3]

Administering a Portable Family's Voucher

Initial Billing Deadline

If a portable family's search for a unit is successful and the receiving PHA intends to administer the family's voucher, the receiving PHA must submit its initial billing notice (Part II of form HUD-52665)

(a) no later than ten (10) business days following the date the receiving PHA **executes** a HAP contract on behalf of the family **and**

(b) in time that the notice will be **received** no later than 60 days following the expiration date of the family's voucher issued by the initial PHA [Notice PIH 2011-3].

A copy of the family's form HUD-50058, Family Report, completed by the receiving PHA must be attached to the initial billing notice. The receiving PHA may send these documents by mail, fax, or e-mail.

PHA Policy

NHA will send its initial billing notice by fax or e-mail, if necessary, to meet the billing deadline but will also send the notice by regular mail.

If the receiving PHA fails to send the initial billing within ten (10) business days following the date the HAP contract is executed, it is required to absorb the family into its own program unless

(a) the initial PHA is willing to accept the late submission or

(b) HUD requires the initial PHA to honor the late submission (e.g., because the receiving PHA is overleased) [Notice PIH 2011-3].

Ongoing Notification Responsibilities [Notice PIH 2011-3, HUD-52665]

Annual Reexamination. The receiving PHA must send the initial PHA a copy of a portable family's updated form HUD-50058 after each annual reexamination for the duration of time the receiving PHA is billing the initial PHA on behalf of the family, regardless of whether there is a change in the billing amount.

PHA Policy

NHA will send a copy of the updated HUD-50058 by regular mail at the same time the initial PHA and owner are notified of the reexamination results.

Change in Billing Amount. The receiving PHA is required to notify the initial PHA, using form HUD-52665, of any change in the billing amount for the family as a result of:

- A change in the HAP amount (because of a reexamination, a change in the applicable payment standard, a move to another unit, etc.)
- An abatement or subsequent resumption of the HAP payments
- Termination of the HAP contract
- Payment of a damage/vacancy loss claim for the family
- Termination of the family from the program

The timing of the notice of the change in the billing amount should correspond with the notification to the owner and the family in order to provide the initial PHA with advance notice of the change. Under no circumstances should the notification be later than 10 business days following the effective date of the change in the billing amount.

Late Payments [Notice PIH 2011-3]

If the initial PHA fails to make a monthly payment for a portable family by the fifth business day of the month, the receiving PHA must promptly notify the initial PHA in writing of the deficiency. The notice must identify the family, the amount of the billing payment, the date the billing payment was due, and the date the billing payment was received (if it arrived late). The receiving PHA must send a copy of the notification to the Office of Public Housing (OPH) in the HUD area office with jurisdiction over the receiving PHA. If the initial PHA fails to correct the problem by the second month following the notification, the receiving PHA may request by memorandum to the director of the OPH with jurisdiction over the receiving PHA that HUD transfer the unit in question. A copy of the initial notification and any subsequent correspondence between the PHAs on the matter must be attached. The receiving PHA must send a copy of the memorandum to the initial PHA. If the OPH decides to grant the transfer, the billing arrangement on behalf of the family ceases with the transfer, but the initial PHA is still responsible for any outstanding payments due to the receiving PHA.

Overpayments [Notice PIH 2011-3]

In all cases where the receiving PHA has received billing payments for billing arrangements no longer in effect, the receiving PHA is responsible for returning the full amount of the overpayment (including the portion provided for administrative fees) to the initial PHA.

In the event that HUD determines billing payments have continued for at least three months because the receiving PHA failed to notify the initial PHA that the billing arrangement was terminated, the receiving PHA must take the following steps:

- Return the full amount of the overpayment, including the portion provided for administrative fees, to the initial PHA.
- Once full payment has been returned, notify the Office of Public Housing in the HUD area office with jurisdiction over the receiving PHA of the date and the amount of reimbursement to the initial PHA.

At HUD's discretion, the receiving PHA will be subject to the sanctions spelled out in Notice PIH 2011-3.

Denial or Termination of Assistance

At any time, the receiving PHA may make a determination to deny or terminate assistance to a portable family for family action or inaction [24 CFR 982.355(c)(9), 24 CFR 982.355(c)(10)].

In the case of a termination, the PHA should provide adequate notice of the effective date to the initial PHA to avoid having to return a payment. In no event should the receiving PHA fail to notify the initial PHA later than ten (10) business days following the effective date of the termination of the billing arrangement. [Notice PIH 2011-3]

PHA Policy

If NHA elects to deny or terminate assistance for a portable family, NHA will notify the initial PHA within ten (10) business days after the informal review or hearing if the denial or termination is upheld.

NHA will base its denial or termination decision on the policies set forth in Chapter 3 or Chapter 12, respectively. The informal review or hearing will be held in accordance with the policies in Chapter 16. NHA will furnish the initial PHA with a copy of the review or hearing decision.

Absorbing a Portable Family

The receiving PHA may absorb an incoming portable family into its own program when the PHA executes a HAP contract on behalf of the family or at any time thereafter providing that:

- (a) the PHA has funding available under its annual contributions contract (ACC) and
- (b) absorbing the family will not result in overleasing [24 CFR 982.355(d)(1), Notice PIH 2011-3].

If the receiving PHA absorbs a family from the point of admission, the admission will be counted against the income targeting obligation of the receiving PHA [24 CFR 982.201(b)(2)(vii)].

If the receiving PHA absorbs a family after providing assistance for the family under a billing arrangement with the initial PHA, HUD encourages the receiving PHA to provide adequate advance notice to the initial PHA to avoid having to return an overpayment. The receiving PHA must specify the effective date of the absorption of the family. [Notice PIH 2011-3]

PHA Policy

If NHA decides to absorb a portable family upon the execution of a HAP contract on behalf of the family, NHA will notify the initial PHA by the initial billing deadline specified on form HUD-52665. The effective date of the HAP contract will be the effective date of the absorption.

If NHA decides to absorb a family after that, it will provide the initial PHA with 30 days' advance notice.

Following the absorption of an incoming portable family, the family is assisted with funds available under the consolidated ACC for the receiving PHA's voucher program [24 CFR 982.355(d)], and the receiving PHA becomes the initial PHA in any subsequent moves by the family under portability.

Chapter 12

12-I.D. MANDATORY TERMINATION OF ASSISTANCE

HUD requires the PHA to terminate assistance in the following circumstances.

Eviction [24 CFR 982.552(b)(2), 24 CFR 5.2005(c)(1)]

The PHA must terminate assistance whenever a family is evicted from a unit assisted under the HCV program for a serious or repeated violation of the lease. As discussed further in section 12-II.E , incidents of actual or threatened domestic violence, dating violence, or stalking may not be construed as serious or repeated violations of the lease by the victim or threatened victim of such violence or stalking.

PHA Policy

A family will be considered *evicted* if the family moves after a legal eviction order has been issued, whether or not physical enforcement of the order was necessary.

If a family moves after the owner has given the family an eviction notice for serious or repeated lease violations but before a legal eviction order has been issued, termination of assistance is not mandatory.

In such cases, , NHA will determine whether the family has committed serious or repeated violations of the lease based on available evidence and may terminate assistance or take any of the alternative measures described in sections 12-II.D and 12-II.E. and other factors as described in Sections 12-II.E. Upon consideration of such factors, NHA may, on a case-by-case basis, choose not to terminate assistance.

Serious and repeated lease violations will include, but not be limited to, nonpayment of rent, disturbance of neighbors, destruction of property, or living or housekeeping habits that cause damage to the unit or premises and criminal activity. Generally, the criterion to be used will be whether or not the reason for the eviction was the fault of the family or guests.

Failure to Provide Consent [24 CFR 982.552(b)(3)]

Other Authorized Reasons for Termination of Assistance [24 CFR 982.552(c), 24 CFR 5.2005(c)]

HUD permits the PHA to terminate assistance under a number of other circumstances. It is left to the discretion of the PHA whether such circumstances in general warrant consideration for the termination of assistance. *As discussed further in section 12-II.E*, the Violence against Women Act of 2005 explicitly prohibits PHAs from considering incidents of, or criminal activity directly related to domestic violence, dating violence, or stalking as reasons for terminating the assistance of a victim of such abuse.

PHA Policy

12-II.E. TERMINATIONS RELATED TO DOMESTIC VIOLENCE, DATING VIOLENCE, OR STALKING

This section addresses the protections against termination of assistance that the Violence against Women Act of 2005 (VAWA) provides for victims of domestic violence, dating violence, and stalking. For general VAWA requirements and PHA policies pertaining to notification, documentation, and confidentiality, see section 16-IX of this plan, where definitions of key VAWA terms are also located.

VAWA Protections against Termination

VAWA provides four specific protections against termination of HCV assistance for victims of domestic violence, dating violence, or stalking. (Note: The second, third, and fourth protections also apply to terminations of tenancy or occupancy by owners participating in the HCV program. So do the limitations discussed under the next heading.)

First, VAWA provides that a PHA may not terminate assistance to a family that moves out of an assisted unit in violation of the lease, with or without prior notification to the PHA, if the move occurred to protect the health or safety of a family member who is or has been the victim of domestic violence, dating violence, or stalking and who reasonably believed he or she was imminently threatened by harm from further violence if he or she remained in the unit [24 CFR 982.314(b)(4)].

Second, it provides that an incident or incidents of actual or threatened domestic violence, dating violence, or stalking may not be construed either as a serious or repeated lease violation by the victim or as good cause to terminate the assistance of the victim [24 CFR 5.2005(c)(1)].

Third, it provides that criminal activity directly related to domestic violence, dating violence, or stalking may not be construed as cause for terminating the assistance of a tenant if a member of the tenant's household, a guest, or another person under the tenant's control is the one engaging in the criminal activity and the tenant or an immediate family member of the tenant is the actual or threatened victim of the domestic violence, dating violence, or stalking [24 CFR 5.2005(c)(2)].

Fourth, it gives PHAs the authority to terminate assistance to any tenant or lawful occupant who engages in criminal acts of physical violence against family members or others, without terminating assistance to, or otherwise penalizing the victim of violence. [24 CFR 5.2009(a)]

Limitations on VAWA Protections [24 CFR 5.2005(d) and (e)]

VAWA does not limit the authority of a PHA to terminate the assistance of a victim of abuse for reasons unrelated to domestic violence, dating violence, or stalking so long as the PHA does not subject the victim to a more demanding standard than it applies to other program participants [24 CFR 5.2005(d)(1)].

Likewise, VAWA does not limit the authority of a PHA to terminate the assistance of a victim of domestic violence, dating violence, or stalking, if the PHA can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the assisted

property the victim is not terminated from assistance. [24 CFR 5.2005(d)(2)]. *HUD regulations define actual and imminent threat to mean words, gestures, actions, or other indicators of a physical threat that (a) is real, (b) would occur within an immediate time frame, and (c) could result in death or serious bodily harm [24 CFR 5.2005(d)(2) and (e)]. In determining whether an individual would pose an actual and imminent threat, the factors to be considered include:*

- *□ The duration of the risk*
- *□ The nature and severity of the potential harm*
- *□ The likelihood that the potential harm will occur*
- *□ The length of time before the potential harm would occur [24 CFR 5.2005(e)]*

Even when a victim poses an actual and imminent threat, however, HUD regulations authorize a PHA to terminate the victim's assistance "only when there are no other actions that could be taken to reduce or eliminate the threat" [24 CFR 5.2005(d)(3)].

Documentation of Abuse [24 CFR 5.2007]

PHA Policy

When an individual facing termination of assistance for reasons related to domestic violence, dating violence, or stalking claims protection under VAWA, the PHA will request that the individual provide documentation supporting the claim in accordance with the policies in section 16-IX.D of this plan.

The PHA reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the individual will suffice. In such cases the PHA will document the waiver in the individual's file.

If NHA can demonstrate an actual and imminent threat to other participants or those employed at or providing service to the property if the participant's tenancy is not terminated, NHA will bypass the standard process and proceed with the immediate termination of the family's assistance.

Terminating the Assistance of a Domestic Violence Perpetrator

Although VAWA provides protection for victims of domestic violence, it does not provide such protection for perpetrators. VAWA gives the PHA the explicit authority to "terminate assistance to any individual who is a tenant or lawful occupant and who engages in criminal acts of physical violence against family members or others...without terminating assistance to, or otherwise penalizing the victim of such violence who is also a tenant or lawful occupant." [24 CFR 5.2009(a)]. This authority supersedes any local, state, or other federal law to the contrary. However, if the PHA chooses to exercise this authority, it must follow any procedures prescribed by HUD or by applicable local, state, or federal law regarding termination of assistance. *This means that the PHA must follow the same rules when terminating assistance to an individual as it would when terminating the assistance of an entire family [3/16/07 Federal Register notice on the applicability of VAWA to HUD programs].*

12-II.F. TERMINATION NOTICE

HUD regulations require PHAs to provide written notice of termination of assistance to a family only when the family is entitled to an informal hearing. However, since the family's HAP

contract and lease will also terminate when the family's assistance terminates [form HUD-52641], it is a good business practice to provide written notification to both owner and family anytime assistance will be terminated, whether voluntarily or involuntarily.

PHA Policy

Whenever a family's assistance will be terminated, NHA will send a written notice of termination to the family and to the owner of the family's unit. The notice will state the date on which the termination will become effective. This date generally will be at least 30 calendar days following the date of the termination notice, but exceptions will be made whenever HUD rules, other PHA policies, or the circumstances surrounding the termination require. When NHA notifies an owner that a family's assistance will be terminated, NHA will, if appropriate, advise the owner of his/her right to offer the family a separate, unassisted lease.

If a family whose assistance is being terminated is entitled to an informal hearing, the notice of termination that the PHA sends to the family must meet the additional HUD and PHA notice requirements discussed in section 16-III.C of this plan. Although HUD does not require PHAs to include information about the protections against termination of assistance provided by the Violence against Women Act of 2005 (VAWA) to victims of domestic violence, dating violence, or stalking, PHAs have the discretion to include such information.

PHA Policy

Whenever the PHA decides to terminate a family's assistance because of the family's action or failure to act, the PHA will include in its termination notice the VAWA information described in section 16-IX.C of this plan and will request that a family member wishing to claim protection under VAWA notify the PHA within 10 business days. Still other notice requirements apply in two situations:

- If a criminal record is the basis of a family's termination, a copy of the record must accompany (or precede) the termination notice, and a copy of the record must also be provided to the subject of the record [24 CFR 982.553(d)].*
- If immigration status is the basis of a family's termination, as discussed in section 12-I.D, the special notice requirements in section 16-III.D must be followed.*

12-III.B. GROUNDS FOR OWNER TERMINATION OF TENANCY [24 CFR 982.310, 24 CFR 5.2005©, and Form HUD-52641-A, Tenancy Addendum].

During the term of the lease, the owner is not permitted to terminate the tenancy except for serious or repeated violations of the lease, certain violations of state or local law, or other good cause.

Serious or Repeated Lease Violations

The owner is permitted to terminate the family's tenancy for serious or repeated violations of the terms and conditions of the lease, except when the violations are related to incidents of actual or threatened domestic violence, dating violence, or stalking and the victim is protected from eviction by the Violence against Women Act of 2005 (see section 12-II.E.). A serious lease violation includes failure to pay

rent or other amounts due under the lease. However, the PHA's failure to make a HAP payment to the owner is not a violation of the lease between the family and the owner.

Violation of Federal, State, or Local Law

The owner is permitted to terminate the tenancy if a family member violates federal, state, or local law that imposes obligations in connection with the occupancy or use of the premises.

Criminal Activity or Alcohol Abuse

The owner may terminate tenancy during the term of the lease if any *covered person*, meaning any member of the household, a guest or another person under the tenant's control commits any of the following types of criminal activity (for applicable definitions see 24 CFR 5.100):

Any criminal activity that threatens the health or safety of, or the right to peaceful enjoyment of the premises by, other residents (including property management staff residing on the premises);

Any criminal activity that threatens the health or safety of, or the right to peaceful enjoyment of their residences by, persons residing in the immediate vicinity of the premises;

Any violent criminal activity on or near the premises; or

Any drug-related criminal activity on or near the premises.

However, in the case of criminal activity directly related to domestic violence, dating violence, or stalking, if the tenant or an immediate member of the tenant's family is the victim, the criminal activity may not be construed as cause for terminating the victim's tenancy (see section 12-II.E).

The owner may terminate tenancy during the term of the lease if any member of the household is:

Fleeing to avoid prosecution, custody, or confinement after conviction for a crime or an attempt to commit a crime that is a felony under the laws of the place from which the individual flees, or that, in the case of the State of New Jersey, is a high misdemeanor; or

Violating a condition of probation or parole imposed under federal or state law.

The owner may terminate tenancy during the term of the lease if any member of the household has engaged in abuse of alcohol that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents.

Evidence of Criminal Activity

The owner may terminate tenancy and evict by judicial action a family for criminal activity by a covered person if the owner determines the covered person has engaged in the criminal activity, regardless of whether the covered person has been arrested or convicted and without satisfying the standard of proof used for a criminal conviction

Other Good Cause

During the initial lease term, the owner may not terminate the tenancy for “other good cause” unless the owner is terminating the tenancy because of something the family did or failed to do.

During the initial lease term or during any extension term, other good cause includes the disturbance of neighbors, destruction of property, or living or housekeeping habits that cause damage to the unit or premises.

After the initial lease term, “other good cause” for termination of tenancy by the owner includes:

- Failure by the family to accept the offer of a new lease or revision;

- The owner's desire to use the unit for personal or family use, or for a purpose other than as a residential rental unit.

- A business or economic reason for termination of the tenancy (such as sale of the property, renovation of the unit, or desire to lease the unit at a higher rent).

After the initial lease term, the owner may give the family notice at any time, in accordance with the terms of the lease.

12-III.D. DECIDING WHETHER TO TERMINATE TENANCY [24 CFR 982.310(h), Pub.L. 109-162]

An owner’s decision to terminate tenancy for incidents related to domestic violence, dating violence, or stalking is limited by the Violence against Women Act of 2005 (VAWA) and the conforming regulations in 24 CFR Part 5, Subpart L..

(See section 12-II.E.)

EXHIBIT 12-1: STATEMENT OF FAMILY OBLIGATIONS
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PHA Policy

NHA will determine if a family has committed serious or repeated violations of the lease based on available evidence, including but not limited to, a court-ordered eviction, or an owner’s notice to evict.

Serious and repeated lease violations will include, but not be limited to, nonpayment of rent, disturbance of neighbors, destruction of property, living or housekeeping habits that cause damage to the unit or premises and criminal activity. Generally, the criterion to be used will be whether or not the reason for the eviction was the fault of the family or guests. [Any incidents of, or criminal activity related to, domestic violence, dating violence, or stalking will not be construed as serious or repeated lease violations by the victim \[24 CFR 5.2005\(c\)\(1\)\].](#)

Chapter 13

13-I.C. OWNER RESPONSIBILITIES [24 CFR 982.452]

- Compling with the Violence against Women Act of 2005 (VAWA) when screening prospective HCV participants or *terminating the tenancy of an HCV family [see 24 CFR Part 5, Subpart L:24 CFR 982.452(b)(1)]*.

Chapter 16

PROGRAM ADMINISTRATION

INTRODUCTION

Part IX: Violence against Women Act (VAWA): Notification, Documentation, Confidentiality. This part contains key terms used in VAWA and describes requirements related to notifying families and owners about their rights and responsibilities under VAWA; requesting documentation from victims of domestic violence, dating violence, and stalking; and maintaining the confidentiality of information obtained from victims.

Unit-by-Unit Exceptions [24 CFR 982.503(c)(2)(ii), 24 CFR 982.505(d), Notice PIH 2010-26]

Unit-by-unit exceptions to the PHA's payment standards generally are not permitted.

However, an exception may be made as a reasonable accommodation for a family that includes a person with disabilities.

(See Chapter 2 for a discussion of reasonable accommodations.)

This type of exception does not affect the PHA's payment standard schedule.

16-III.B. INFORMAL REVIEWS

Informal reviews are provided for program applicants. An applicant is someone who has applied for admission to the program, but is not yet a participant in the program. Informal reviews are intended to provide a "minimum hearing requirement" [24 CFR 982.554], and need not be as elaborate as the informal hearing requirements. [Federal Register 60, no. 127 (July 3, 1995)].

Decisions Subject to Informal Review

The PHA must give an applicant the opportunity for an informal review of a decision denying assistance [24 CFR 982.554(a)]. Denial of assistance may include any or all of the following [24 CFR 982.552(a)(2)]:

- Denying listing on the PHA waiting list
- Denying or withdrawing a voucher
- Refusing to enter into a HAP contract or approve a lease
- Refusing to process or provide assistance under portability procedures

Informal reviews are *not* required for the following reasons [24 CFR 982.554(c)]:

- Discretionary administrative determinations by the PHA
- General policy issues or class grievances
- A determination of the family unit size under the PHA subsidy standards
- A PHA determination not to grant approval of the tenancy
- A PHA determination that the unit is not in compliance with the HQS

- A PHA determination that the unit is not in accordance with the HQS due to family size or composition

Scheduling an Informal Review

PHA Policy

A request for an informal review must be made in writing and delivered to NHA either in person or by first class mail, by the close of the business day, no later than ten (10) business days from the date of NHA's denial of assistance.

, NHA must schedule and send written notice of the informal review within ten (10) business days of the family's request.

Informal Review Procedures [24 CFR 982.554(b)]

The informal review must be conducted by a person other than the one who made or approved the decision under review, or a subordinate of this person.

The applicant must be provided an opportunity to present written or oral objections to the decision of NHA.

16-III.C. INFORMAL HEARINGS FOR PARTICIPANTS [24 CFR 982.555]

PHAs must offer an informal hearing for certain PHA determinations relating to the individual circumstances of a participant family. A participant is defined as a family that has been admitted to the PHA's HCV program and is currently assisted in the program. The purpose of the informal hearing is to consider whether the PHA's decisions related to the family's circumstances are in accordance with the law, HUD regulations and PHA policies.

The PHA is not permitted to terminate a family's assistance until the time allowed for the family to request an informal hearing has elapsed, and any requested hearing has been completed. Termination of assistance for a participant may include any or all of the following:

- Refusing to enter into a HAP contract or approve a lease
- Terminating housing assistance payments under an outstanding HAP contract
- Refusing to process or provide assistance under portability procedures

Decisions Subject to Informal Hearing

Circumstances for which the PHA must give a participant family an opportunity for an informal hearing are as follows:

- A determination of the family's annual or adjusted income, and the use of such income to compute the housing assistance payment
- A determination of the appropriate utility allowance (if any) for tenant-paid utilities from the PHA utility allowance schedule
- A determination of the family unit size under the PHA's subsidy standards

- A determination to terminate assistance for a participant family because of the family's actions or failure to act
- A determination to terminate assistance because the participant has been absent from the assisted unit for longer than the maximum period permitted under PHA policy and HUD rules
- A determination to terminate a family's Family Self Sufficiency contract, withhold supportive services, or propose forfeiture of the family's escrow account [24 CFR 984.303(i)]

Medical/Disability Records

PHAs are not permitted to inquire about the nature or extent of a person's disability.

The PHA may not inquire about a person's diagnosis or details of treatment for a disability or medical condition.

If the PHA receives a verification document that provides such information, the PHA should not place this information in the tenant file.

The PHA should destroy the document.

Documentation of Domestic Violence, Dating Violence, or Stalking

For requirements and PHA policies related to management of documentation obtained from victims of domestic violence, dating violence, or stalking, see section 16-IX.E.

PART IX: VIOLENCE AGAINST WOMEN ACT (VAWA): NOTIFICATION, DOCUMENTATION, CONFIDENTIALITY

16-IX.A. 16-IX.A. OVERVIEW

The Violence against Women Act of 2005 (VAWA) provides special protections for victims of domestic violence, dating violence, and stalking who are applying for or receiving assistance under the housing choice voucher (HCV) program. If your state or local laws provide greater protection for such victims, those laws take precedence over VAWA.

In addition to definitions of key terms used in VAWA, this part contains general VAWA requirements and PHA policies in three areas: notification, documentation, and confidentiality. Specific VAWA requirements and PHA policies are located primarily in the following sections: 3-I.C, "Family Breakup and Remaining Member of Tenant Family"; 3-III.G, "Prohibition against Denial of Assistance to Victims of Domestic Violence, Dating Violence, and Stalking"; 10-I.A, "Allowable Moves"; 10-I.B, "Restrictions on Moves"; 12-II.E, "Terminations Related to Domestic Violence, Dating Violence, or Stalking"; and 12-II.F, "Termination Notice."

16-IX.B. DEFINITIONS [24 CFR 5.2003]

As used in VAWA:

- *The term bifurcate means, with respect to a public housing or Section 8 lease, to divide a lease as a matter of law such that certain tenants can be evicted or removed while the remaining family members' lease and occupancy rights are allowed to remain intact.*
- *The term dating violence means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:*
 - *The length of the relationship*
 - *The type of relationship*
 - *The frequency of interaction between the persons involved in the relationship*
- *The term domestic violence includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.*
- *The term immediate family member means, with respect to a person:*
 - *A spouse, parent, brother or sister, or child of that person, or an individual to whom that person stands in the position or place of a parent; or*
 - *Any other person living in the household of that person and related to that person by blood and marriage.*
- *The term stalking means:*
 - *To follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate; or*
 - *To place under surveillance with the intent to kill, injure, harass, or intimidate another person; and*
 - *In the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to (1) that person, (2) a member of the immediate family of that person, or (3) the spouse or intimate partner of that person.*

16-IX.C. NOTIFICATION [24 CFR 5.2005(a)]

Notification to Public

The PHA adopts the following policy to help ensure that all actual and potential beneficiaries of its HCV program are aware of their rights under VAWA.

PHA Policy

NHA will post the following information regarding VAWA in its offices.

It will also make the information readily available to anyone who requests it.

A summary of the rights and protections provided by VAWA to housing choice

voucher program applicants and participants who are or have been victims of domestic violence, dating violence, or stalking (see sample notices in Exhibits 16-1 and 16-2)

The definitions of domestic violence, dating violence, and stalking provided in VAWA (included in Exhibits 16-1 and 16-2)

An explanation of the documentation that the PHA may require from an individual who claims the protections provided by VAWA (included in Exhibits 16-1 and 16-2)

A copy of form HUD-50066, Certification of Domestic Violence, Dating Violence, or Stalking

A statement of the PHA's obligation to keep confidential any information that it receives from a victim unless (a) the PHA has the victim's written permission to release the information, (b) it needs to use the information in an eviction proceeding, or (c) it is compelled by law to release the information (included in Exhibits 16-1 and 16-2)

The National Domestic Violence Hot Line: 1-800-799-SAFE (7233) or 1-800-787-3224 (TTY) (included in Exhibits 16-1 and 16-2)
Contact information for local victim advocacy groups or service providers

Notification to Program Applicants and Participants [24 CFR 5.2005(a)(1)]

PHAs are required to inform program participants of their rights under VAWA, including their right to confidentiality and the limits thereof. Since VAWA provides protections for applicants as well as participants, PHAs may elect to provide the same information to applicants.

VAWA requires PHAs to notify HCV program participants of their rights under this law, including their right to confidentiality and the limits thereof.

PHA Policy

NHA will provide all applicants with information about VAWA at the time they request an application for housing assistance.

NHA will also include information about VAWA in all notices of denial of assistance (see section 3-III.G).

NHA will provide all participants with **notification of their protections and rights Under information about** VAWA at the time of admission (see section 5-I.B) and at annual reexamination.

NHA will also include information about VAWA in notices of termination of assistance, as provided in section 12-II.F. The VAWA information provided to applicants and participants will consist of the notice in Exhibit 16-1 and a copy of form HUD-50066, Certification of Domestic Violence, Dating Violence, and Stalking.

Notification to Owners and Managers [24 CFR 5.2005(a)(2)]

PHA's are required to notify owners and managers participating in the HCV program of their rights and obligations under VAWA.

PHA Policy

NHA will provide owners and managers with information about their rights and obligations under VAWA when they begin their participation in the HCV program and at least annually thereafter. The VAWA information provided to owners will consist of the notice in Exhibit 16-2 and a copy of form HUD-50066, Certification of Domestic Violence, Dating Violence, and Stalking.

16-IX.D. DOCUMENTATION [24 CFR 5.2007]

A PHA presented with a claim for initial or continued assistance based on status as a victim of domestic violence, dating violence, stalking, or criminal activity related to any of these forms of abuse may—but is not required to—request that the individual making the claim document the abuse. Any request for documentation must be in writing, and the individual must be allowed at least 14 business days after receipt of the request to submit the documentation. The PHA may extend this time period at its discretion. [24 CFR 5.2007(a)]

The individual may satisfy the PHA's request by providing any one of the following three forms of documentation [24 CFR 5.2007(b)]:

(1) A completed and signed HUD-approved certification form (HUD-50066, Certification of Domestic Violence, Dating Violence, or Stalking), which must include the name of the perpetrator

(2) A federal, state, tribal, territorial, or local police report or court record

(3) Documentation signed by a person who has assisted the victim in addressing domestic violence, dating violence, or stalking, or the effects of such abuse. This person may be an employee, agent, or volunteer of a victim service provider; an attorney; or a medical professional. The person signing the documentation must attest under penalty of perjury to the person's belief that the incidents in question are bona fide incidents of abuse.

The victim must also sign the documentation.

The PHA may not require third-party documentation (forms 2 and 3) in addition to certification (form 1), except as specified below under "Conflicting Documentation," nor may it require certification in addition to third-party documentation [VAWA final rule].

PHA Policy

Any request for documentation of domestic violence, dating violence, or stalking will specify a deadline of 14 business days following receipt of the request, will describe the three forms of acceptable documentation, will provide explicit instructions on where and to whom the documentation must be submitted, and will state the consequences for

failure to submit the documentation or request an extension in writing by the deadline.

NHA may, in its discretion, extend the deadline for 10 business days. Any extension granted by NHA will be in writing.

Conflicting Documentation [24 CFR 5.2007(e)]

In cases where the PHA receives conflicting certification documents from two or more members of a household, each claiming to be a victim and naming one or more of the other petitioning household members as the perpetrator, the PHA may determine which is the true victim by requiring each to provide acceptable third-party documentation, as described above (forms 2 and 3).

The PHA must honor any court orders issued to protect the victim or to address the distribution of property.

PHA Policy

If presented with conflicting certification documents (two or more forms HUD-50066) from members of the same household, NHA will attempt to determine which is the true victim by requiring each of them to provide third-party documentation in accordance with 24 CFR 5.2007(b)(2) or (3) and by following any HUD guidance on how such determinations should be made.

Discretion to Require No Formal Documentation [24 CFR 5.2007(d)]

The PHA has the discretion to provide benefits to an individual based solely on the individual's statement or other corroborating evidence—i.e., without requiring formal documentation of abuse in accordance with 24 CFR 5.2007(b).

PHA Policy

NHA will not accept an individual's statement or other corroborating evidence of domestic violence, dating violence, or stalking,

Failure to Provide Documentation [24 CFR 5.2007(c)]

In order to deny relief for protection under VAWA, a PHA must provide the individual requesting relief with a written request for documentation of abuse. If the individual fails to provide the documentation within 14 business days from the date of receipt, or such longer time as the PHA may allow, the PHA may deny relief for protection under VAWA.

16-IX.E. CONFIDENTIALITY [24 CFR 5.2007(b)(4)]

All information provided to the PHA regarding domestic violence, dating violence, or stalking, including the fact that an individual is a victim of such violence or stalking, must be retained in confidence.

This means that the PHA:

(1) may not enter the information into any shared database,

(2) may not allow employees or others to access the information unless they are explicitly authorized to do so and have a need to know the information for purposes of their work, and

(3) may not provide the information to any other entity or individual, except to the extent that the disclosure is:

- (a) requested or consented to by the individual in writing,*
- (b) required for use in an eviction proceeding, or*
- (c) otherwise required by applicable law.*

PHA Policy

If disclosure is required for use in an eviction proceeding or is otherwise required by applicable law, NHA will inform the victim before disclosure occurs so that safety risks can be identified and addressed.

EXHIBIT 16-1: SAMPLE NOTICE TO HOUSING CHOICE VOUCHER APPLICANTS AND TENANTS REGARDING THE VIOLENCE AGAINST WOMEN ACT (VAWA)

This sample notice was adapted from a notice prepared by the National Housing Law Project. A federal law that went into effect in 2006 protects individuals who are victims of domestic violence, dating violence, and stalking. The name of the law is the Violence against Women Act, or “VAWA.” This notice explains your rights under VAWA.

Protections for Victims

If you are eligible for a Section 8 voucher, the housing authority cannot deny you rental assistance solely because you are a victim of domestic violence, dating violence, or stalking. If you are the victim of domestic violence, dating violence, or stalking, you cannot be terminated from the Section 8 program or evicted based on acts or threats of violence committed against you. Also, criminal acts directly related to the domestic violence, dating violence, or stalking that are caused by a member of your household or a guest can’t be the reason for evicting you or terminating your rental assistance if you were the victim of the abuse.

Reasons You Can Be Evicted

You can be evicted and your rental assistance can be terminated if the housing authority or your landlord can show there is an actual and imminent (immediate) threat to other tenants or employees at the property if you remain in your housing. Also, you can be evicted and your rental assistance can be terminated for serious or repeated lease violations that are not related to the domestic violence, dating violence, or stalking committed against you. The housing authority and your landlord cannot hold you to a more demanding set of rules than it applies to tenants who are not victims.

Removing the Abuser from the Household

Your landlord may split the lease to evict a tenant who has committed criminal acts of violence against family members or others, while allowing the victim and other household members to stay in the assisted unit. Also, the housing authority can terminate the abuser’s Section 8 rental assistance while allowing you to continue to receive assistance. If the landlord or housing authority chooses to remove the abuser, it may not take away the remaining tenants’ rights to the unit or otherwise punish the remaining tenants. In removing the abuser from the household, your landlord must follow federal, state, and local eviction procedures.

Moving to Protect Your Safety

The housing authority may permit you to move and still keep your rental assistance, even if your current lease has not yet expired. The housing authority may require that you be current on your rent or other obligations in the housing choice voucher program. The housing authority may ask you to provide proof that you are moving because of incidences of abuse.

Proving That You Are a Victim of Domestic Violence, Dating Violence, or Stalking

The housing authority and your landlord can ask you to prove or “certify” that you are a victim of domestic violence, dating violence, or stalking. The housing authority or your landlord must give you at least 14 business days (i.e., Saturdays, Sundays, and holidays do not count) to provide this proof. The housing authority and your landlord are free to extend the deadline.

There are three ways you can prove that you are a victim:

- ☐ *Complete the certification form given to you by the housing authority or your landlord. The form will ask for your name, the name of your abuser, the abuser’s relationship to you, the date, time, and location of the incident of violence, and a description of the violence.*
- ☐ *Provide a statement from a victim service provider, attorney, or medical professional who has helped you address incidents of domestic violence, dating violence, or stalking. The professional must state that he or she believes that the incidents of abuse are real. Both you and the professional must sign the statement, and both of you must state that you are signing “under penalty of perjury.”*
- ☐ *Provide a police or court record, such as a protective order.*

If you fail to provide one of these documents within the required time, the landlord may evict you, and the housing authority may terminate your rental assistance.

Confidentiality

The housing authority and your landlord must keep confidential any information you provide about the violence against you, unless:

- ☐ *You give written permission to the housing authority or your landlord to release the information.*
- ☐ *Your landlord needs to use the information in an eviction proceeding, such as to evict your abuser.*
- ☐ *A law requires the housing authority or your landlord to release the information.*

If release of the information would put your safety at risk, you should inform the housing authority and your landlord.

VAWA and Other Laws

VAWA does not limit the housing authority’s or your landlord’s duty to honor court orders about access to or control of the property. This includes orders issued to protect a victim and orders dividing property among household members in cases where a family breaks up.

VAWA does not replace any federal, state, or local law that provides greater protection for victims of domestic violence, dating violence, or stalking.

For Additional Information

For help and advice on escaping an abusive relationship, call the National Domestic Violence Hotline at 1-800-799-SAFE (7233) or -800-787-3224 (TTY).

Definitions

For purposes of determining whether a tenant may be covered by VAWA, the following list of definitions applies:

VAWA defines domestic violence to include felony or misdemeanor crimes of violence committed by any of the following:

- ☐ *A current or former spouse of the victim*
- ☐ *A person with whom the victim shares a child in common*
- ☐ *A person who is cohabitating with or has cohabitated with the victim as a spouse*
- ☐ *A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies*
- ☐ *Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction*

VAWA defines dating violence as violence committed by a person (1) who is or has been in a social relationship of a romantic or intimate nature with the victim AND (2) where the existence of such a relationship shall be determined based on a consideration of the following factors:

- ☐ *The length of the relationship*
- ☐ *The type of relationship*
- ☐ *The frequency of interaction between the persons involved in the relationship*

VAWA defines stalking as (A)(i) to follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate another person OR (ii) to place under surveillance with the intent to kill, injure, harass, or intimidate another person AND (B) in the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to (i) that person, (ii) a member of the immediate family of that person, or (iii) the spouse or intimate partner of that person.

EXHIBIT 16-2: SAMPLE NOTICE TO HOUSING CHOICE VOUCHER OWNERS AND MANAGERS REGARDING THE VIOLENCE AGAINST WOMEN ACT (VAWA)

This sample notice was adapted from a notice prepared by the National Housing Law Project. A federal law that went into effect in 2006 protects individuals who are victims of domestic violence, dating violence, and stalking. The name of the law is the Violence against Women Act, or "VAWA." This notice explains your obligations under VAWA.

Protections for Victims

You cannot refuse to rent to an applicant solely because he or she is a victim of domestic violence, dating violence, or stalking.

You cannot evict a tenant who is the victim of domestic violence, dating violence, or stalking based on acts or threats of violence committed against the victim. Also, criminal acts directly related to the domestic violence, dating violence, or stalking that are caused by a household member or guest cannot be cause for evicting the victim of the abuse.

Permissible Evictions

*You can evict a victim of domestic violence, dating violence, or stalking if you can demonstrate that there is an actual **and** imminent (immediate) threat to other tenants or employees at the property if the victim is not evicted. Also, you may evict a victim for serious or repeated lease violations that are not related to the domestic violence, dating violence, or stalking. You cannot hold a victim of domestic violence, dating violence, or stalking to a more demanding standard **than you hold** tenants who are not victims.*

Removing the Abuser from the Household

*You may **bifurcate** (split) the lease to evict a tenant who has committed criminal acts of violence against family members or others, while allowing the victim and other household members to stay in the unit. If you choose to remove the abuser, you may not take away the remaining tenants' rights to the unit or otherwise punish the remaining tenants. In removing the abuser from the household, you must follow federal, state, and local eviction procedures.*

Certification of Domestic Violence, Dating Violence, or Stalking

If a tenant asserts VAWA's protections, you can ask the tenant to certify that he or she is a victim of domestic violence, dating violence, or stalking. You are not required to demand official documentation and may rely upon the victim's statement alone. If you choose to request certification, you must do so in writing and give the tenant at least 14 business days to provide documentation. You are free to extend this deadline. A tenant can certify that he or she is a victim by providing any one of the following three documents:

*☐ **A completed, signed** HUD-approved certification form. The most recent form is HUD-50066. This form is available at the housing authority, or online at <http://www.hud.gov/offices/adm/hudclips/>.*

*☐ **A statement** from a victim service provider, attorney, or medical professional who has helped the victim address incidents of domestic violence, dating violence, or stalking. The professional must state that he or she believes that the incidents of abuse are real. Both the victim and the professional must sign the statement under penalty of perjury.*

*☐ **A police or court record**, such as a protective order.*

If the tenant fails to provide one of these documents within 14 business days, you may evict the tenant if authorized by otherwise applicable law and lease provisions.

Confidentiality

You must keep confidential any information a tenant provides to certify that he or she is a victim of domestic violence, dating violence, or stalking. You cannot enter the information into a shared database or reveal it to outside entities unless:

- ☐ *The tenant provides written permission releasing the information.*
- ☐ *The information is required for use in an eviction proceeding, such as to evict the abuser.*
- ☐ *Release of the information is otherwise required by law.*

The victim should inform you if the release of the information would put his or her safety at risk.

VAWA and Other Laws

VAWA does not limit your obligation to honor court orders regarding access to or control of the property. This includes orders issued to protect the victim and orders dividing property among household members in cases where a family breaks up.

VAWA does not replace any federal, state, or local law that provides greater protection for victims of domestic violence, dating violence, or stalking.

Additional Information

☐ *HUD Notice PIH 2006-42 contains detailed information regarding VAWA's certification requirements. The notice is available at <http://www.hud.gov/offices/adm/hudclips/>.*

☐ *For a discussion of VAWA's housing provisions, see the preamble to the final VAWA rule, which is available at <http://www.gpo.gov/fdsys/pkg/FR-2010-10-27/pdf/2010-26914.pdf>*

Definitions

For purposes of determining whether a tenant may be covered by VAWA, the following list of definitions applies:

VAWA defines domestic violence to include felony or misdemeanor crimes of violence committed by any of the following:

- ☐ *A current or former spouse of the victim*
- ☐ *A person with whom the victim shares a child in common*
- ☐ *A person who is cohabitating with or has cohabitated with the victim as a spouse*
- ☐ *A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies*
- ☐ *Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction*

VAWA defines dating violence as violence committed by a person (1) who is or has been in a social relationship of a romantic or intimate nature with the victim AND (2) where the existence

of such a relationship shall be determined based on a consideration of the following factors:

- The length of the relationship*
- The type of relationship*
- The frequency of interaction between the persons involved in the relationship*

VAWA defines stalking as (A)(i) to follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate another person OR (ii) to place under surveillance with the intent to kill, injure, harass, or intimidate another person AND (B) in the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily injury to, or to cause substantial emotional harm to (i) that person, (ii) a member of the immediate family of that person, or (iii) the spouse or intimate partner of that person.

ATTACHMENT B3: FEDERAL LEASE ATTACHMENT

Original

Section 6. Occupancy of Dwelling Unit

- 2.) Not to use or permit the use of the dwelling unit for any illegal purposes, **or giving refuge to**, or other purposes which impairs the physical or social environment of the development.
- 23.) To ensure that all school-aged children listed on the Lease or added thereafter, are enrolled and attend school regularly in accordance with Management's **Truancy Policy** (i.e. no more than 10 unexcused absences during the school year). If the child is not sick, he/she must attend the after-school program and complete any work missed while absent. Any child that is otherwise excluded from school must be enrolled in an after-school or other education. Resident shall be required to sign an authorization enabling Management to obtain school attendance records to verify compliance with this Paragraph. It is the policy of Management to work with residents, resident organizations, school officials and community resources to reduce the amount of truancy of youth residing in assisted housing in accordance with Management's **Truancy Prevention Policy** incorporated by reference into this Lease. Failure to comply with this policy will be deemed a material violation of this Lease and may result in termination or non-renewal of this Lease.
- 25.) Management has established a No Smoking Policy at Building ____ **at 261 Ely Avenue, Norwalk, Connecticut ("the Building")**. Residents shall not smoke, or permit any household member, visitor or guest to smoke in or within 20 feet from the Building. Any Resident who smokes, or allows any household member, visitor or guest to smoke in or within 20feet of the Building shall be subject to termination of tenancy in accordance with Section 11 (b) of this Lease.

Proposed

Section 6. Resident Obligations

- 2.) Not to use or permit the use of the dwelling unit for any illegal purposes, **including but not limited to harboring a person wanted by the Police**, or other purposes which impairs the physical or social environment of the development.
- 23.) Residents of 356 Main Avenue, King Kennedy Homes and Elmwood Avenue shall mow individual apartment front, rear and/or side yard and lawn and trim. Resident shall shovel snow from your porch, steps, and sidewalks to the apartment from the main sidewalk.
- 24.) To ensure that all school-aged children listed on the Lease or added thereafter, are enrolled and attend school regularly in accordance with Management's **Progressive Student Success Program** (i.e. no more than 10 unexcused absences during the school year). If the child is not sick, he/she must attend the after-school program and complete any work missed while absent. Any child that is otherwise excluded from school must be enrolled in an after-school or other educational **program**. Resident shall be

required to sign an authorization enabling Management to obtain school attendance records to verify compliance with this Paragraph. It is the policy of Management to work with residents, resident organizations, school officials and community resources to reduce the amount of truancy of youth residing in assisted housing in accordance with Management's **Progressive Student Success Program** incorporated by reference into this Lease. Failure to comply with this policy will be deemed a material violation of this Lease and may result in termination or non-renewal of this Lease. **Pending continuing consideration, dialogue, and approval with HUD.**

- 26.) Management has established a Smoke Free Housing Policy **for all of management's housing complexes.** Residents shall not smoke, or permit any household member, visitor or guest to smoke in or on NHA property within 20 feet from the Building on NHA property. Any Resident who smokes, or allows any household member, visitor or guest to smoke in or within 20 feet of the Building shall be subject to termination of tenancy in accordance with Section 11 (b) of this Lease.

Norwalk Housing Authority

Memorandum

To: Curtis O. Law, Executive Director
From: Kras Carlucci, Director of Housing Operations
Date: 3/12/2012
Subject: Proposed Smoke Free Housing Policy

Information regarding Norwalk Housing Authority's proposal to become a smoke free housing authority was disseminated to tenants through various efforts. Tenants were notified by mail of meetings to be held at developments.

Attendance at these meetings was as follows:

Leroy Downs	5
20 West	7
Senior Court	3
Roodner Court	9
Freese/Shostak	14
Ludlow Village	4
Washington Village	8
Chapel/ Main/ Fairfield	1

January 12, 2012 Meeting

10 am- 5 in attendance

7 pm- 12 in attendance

Speakers from the MATCH Coalition presented a slide show on the dangers of second hand smoke, and provided tenants with information on local cessation programs.

The November 2011 rent statement included a copy of the NHA News which had an article on the Proposed Smoke Free Housing Policy, and the availability of cessation programs.

All tenants were surveyed to see if they support or not support the Smoke Free Policy. Three hundred and thirty eight (338) tenants responded, two hundred and forty two (242) were in favor of the policy, fifty six (56) were not.

KC/es

Norwalk Housing Authority Memorandum

Meeting minutes

A Public Hearing was held on March 1, 2012 at 5:30pm at the Leroy Downs Apartments, 26 Monroe Street, Norwalk, CT regarding the 2012 PHA Public Housing Agency Plan with amendments to the Smoke Free Housing Policy.

No residents attended and no comments were made.

NOTICE OF PUBLIC HEARING

The Norwalk Housing Authority will be conducting a Public Hearing regarding revisions to the 2012 Public Housing Agency Plan regarding the Smoke Free Housing Policy. The Public Hearing will be held on **March 1, 2012** at 5:30 p.m. in the community room at Leroy Downs Apartments, 26 Monroe St., Norwalk, CT.

Proposed documents are available from 9:00 a.m. to 5:00 p.m. business days for review at the Norwalk Housing Authority Central Office, 24½ Monroe Street, Norwalk. EHO

Smoke Free Meetings

To insure the air quality and health of residents in Norwalk Housing Authority's housing programs, we propose to declare all our residential properties as smoke free effective April 1, 2012 as part of NHA's PHA Plan.

Smoke Free Meetings were held on the following:

November 3, 2011	Leroy Downs Apartments Community Room at 10:00am 20 West Avenue Community Room at 11:30am Senior Court Community Center at 1:00pm Ludlow Village Community Center at 2:30pm Shostak & Freese Community Center at 4:00pm
November 9, 2011	Roodner Court Learning Center at 6:00pm
November 28, 2011	Washington Village Learning Center at 6:30 pm for: Washington Village residents King Kennedy residents Elmwood Avenue residents Fort Point residents
November 29, 2011	Leroy Downs Community Room at 6:30 pm for: Chapel Street residents 356 Main Ave residents Fairfield Avenue residents
December 5, 2011	Public Hearing & Board of Commissioners meeting on 2012 PHA Plan; Smoke Free Housing Policy removed from draft
January 12, 2012	All residents invited to Norwalk Police Dept. at 10:00am and 7:30pm to discuss Smoke Free Housing Policy
January 18, 2012	Board of Commissioners meeting held
March 1, 2012	Public Hearing regarding revisions to the 2012 Public Housing Agency Plan with respect to the Smoke Free Housing Policy

NHA NEWS

"PLANTING SEEDS FOR SUCCESS"

FEBRUARY 2012

GAURENTEED INTERVIEWS

Are you new to the workforce or recently re-entering the workforce? Maybe you have gaps in your work history or have been laid off. Or you're a recent high school or college graduate looking for employment. Do you feel like finding a job is like finding a needle in a haystack? Tired of endlessly going from employer to employer to apply for a job, only to be rejected or ignored? NHA is partnering with Career Resources, a nationally recognized workforce development organization, to bring this three-week intensive job-readiness training and job placement assistance program to you! Training focuses on developing positive attitudes and work habits for successful long term job retention. STRIVE is an international employment program with successful employment results. In Connecticut, there is over 70% employment rate for graduates! While STRIVE cannot guarantee jobs, program graduates are guaranteed interviews. It will be held at NHA's 20 West Avenue Learning Center, Monday through Friday from 9:00 AM - 4:00PM, starting Monday March 5th through Friday March 23rd. Participants MUST be able to attend ALL days and are responsible for their own childcare during this time. All STRIVE graduates will be eligible for a drawing for a FREE refurbished DELL computer & flat screen monitor! For more information and to register, please call 203-838-8471 X188 Lisa Roger or X181 Sandra-Ann Nolfo.



FREE Tax Preparation Services Open!

Tax season is here! Households earning less than \$50,000 may be eligible to save an average of \$150 in tax preparation fees through VITA's (Volunteer Income Tax Assistance) free tax preparation service, provided by IRS-certified volunteers and may qualify for CT's new State Earned Income Tax Credit, worth up to \$1700 in your pockets! This year's free Norwalk tax sites will include: NEON, Inc., 98 South Main Street, Mondays 10am - 4pm; Tuesdays/Thursdays 5 - 8pm; and Norwalk Community College (walk-ins only), 188 Richards Avenue, RM W135, Saturdays 10:30am - 3:30PM. Dial 2-1-1 for site-specific information.

Ludlow Commons Now Accepting Applications February 1, 2012- March 30, 2012

Owner: Norwalk Housing Authority
Located At: Ludlow Commons, 11 Roger Square, Norwalk, CT 06855
Managed By: Elderly Housing Management, Inc.

INCOME LIMITS: \$57,750 FOR ONE PERSON



"It's Here! It's Here!"

Peter Agosto, Maintenance Supervisor was OUTRAGEOUSLY helpful with the Bridgeport Rescue Mission Thanksgiving turkey give-away for NHA residents. At both Roodner Court and Washington Village, Peter graciously allowed use and set up of his own personal tents for registration and distribution of 275 turkeys. NHA would like to thank Peter for constantly being responsive, accommodating and helpful, even with last minute requests! Then, on Friday December 23rd, Bridgeport Rescue Mission delivered hot dinner meals as scheduled. Lisa Roger, FSS Manager and her husband were there to help out. As soon as the truck pulled into the driveway, the kids were jumping up and down, screaming, "It's here! It's here!" and quickly formed a line in front of the food truck. One can imagine the surprise when Jennifer from the Bridgeport Rescue Mission came driving in a HUGE van behind the food truck. Jennifer's van was FILLED with baked goods, candy and wrapped presents for the kids! Bridgeport Rescue Mission served 130 hot meals, with a bag of home-baked cookies for each meal. After the kids and families got their meals, they were directed to the van where they gave out a plastic candy cane filled with Hershey kisses for each family and gifts labeled by sex and age.

Everyone walked away with something.

NOTICE OF PUBLIC HEARING

The NHA will be conducting a Public Hearing regarding revisions to the 2012 Public Housing Agency Plan regarding the Smoke Free Housing Policy. The Public Hearing will be held on March 1, 2012 at 5:30 p.m. in the community room at Leroy Downs Apartments, 26 Monroe St., Norwalk, CT.

MINUTES OF MEETING

Smoke Free Housing Meeting

DATE: January 12, 2012

ATTENDEES:

Open to all tenants.

MEETING SUMMARY:

The meeting was held on January 12, 2012 at 7:00 p.m. to discuss the proposed Smoke Free Housing. Presentation and then opened it up for a round table questions and answer.

1. *Gene- Washington Village:*
Smoke sometimes, she's in favor of the policy.
2. *Deidra D.- Roodner Court:*
Against policy, invasion of privacy, suggests a smoke area where the clothes lines use to be.
3. *Ebony- Roodner Court:*
Totally against it- passed around petition at Roodner Court.
4. *Sheiria- Roodner Court:*
People don't know their rights; that's why they are not at the meeting. It's ok if we enforce the non-smoke rules in the hallways. Nobody wants to be evicted due to smoking.
5. *Mary Kingwood- Washington Village:*
Does not smell the cigarettes, doesn't like the idea she has to walk guests outside so they can smoke.
6. *Coriann- Roodner Court:*
It would be different if this was the policy before they moved in to Roodner Court.
7. *Shatiqua- Roodner Court:*
A lot of language barrier in Roodner Court, that's why they couldn't get more signatures on the petition.
8. *Amanda- Chapel St.:*
It wasn't on the lease when she moved in, doesn't want guests to smoke outside. What will she do to her 2 year old when people are smoking outside and she goes with them.
9. *Andrea Smith- King Kennedy:*
Does not smoke, doesn't let people smoke in her house, let people smoke where they want, don't tell people what to do in their house, against the policy.
10. *Vivian R.- Leroy Downs:*
She can't breathe. Doesn't think it's fair for her to die because her neighbor smokes.
11. *Washington Village:*
Has to two (2) doors, why can't she smoke by her doors. Doesn't want to go across the street to smoke.

This is an important notice. Please have it translated.

Este e' un aviso importante. Sirvase mandarlo traducir.

Ca ce you bagay ki important. Fe yo traduit li pou ou sous ple.

C'est une annonce tres important. Faite la traduction s'il vout plait.

Smoke Free Housing Policy

In response to requests for additional meetings on NHA's proposed Smoke Free Housing Policy, meetings have been schedule for **January 12, 2012 at 10:00am and 7:30pm** in the Norwalk Police Department Community Room, 1 Monroe Street, Norwalk to discuss Smoke Free Housing. **Proposed Policy:** Residents shall not smoke, or permit any household member, visitor or guest to smoke in or within 20 feet from the Building. Any Resident who smokes, or allows any household member, visitor or guest to smoke in or within 20 feet of the Building shall be subject to termination of tenancy in accordance with Section 11 (b) of this Lease. **Proposed Effective Date:** April 1, 2012

***Snow date: January 17, 2011 at 10:00am & 7:30pm**

If you are in need of a ride, please call Nicole Ruffin by 4:00pm on January 10, 2011.

This is an important notice. Please have it translated.

Este e' un aviso importante. Sirvase mandarlo traducir.

Ca ce you bagay ki important. Fe yo traduit li pou ou sous ple.

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Smoke Free Housing Policy

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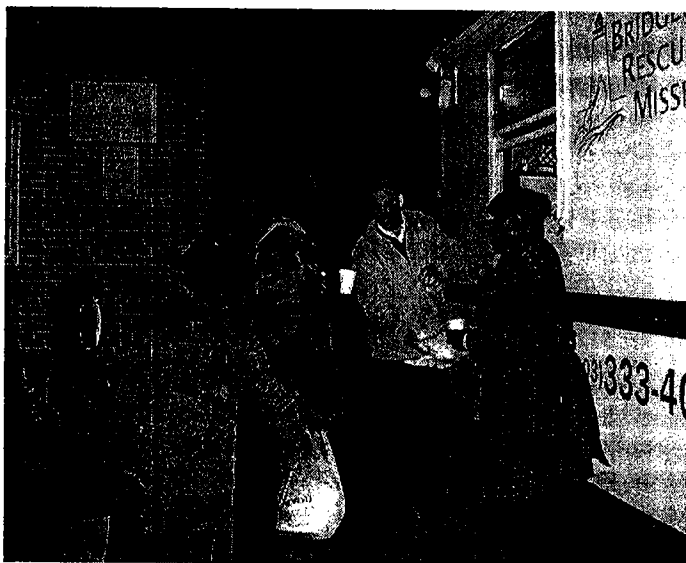
***Snow date: January 17, 2011 at 10:00am & 7:30pm**

If you are in need of a ride, please call Nicole Ruffin by 4:00pm on January 10, 2011.

Learning Center Staff Spot Light

April Jackson is an Education Coordinator at the 20 West Avenue Learning Center and a graduate of Central Connecticut State University with a B.A. in Psychology and a minor in Business. April grew up in Roodner Court and states that it helped prepare and equip her with the

necessary tools to find out who she was and what she wanted to do with her life. April states that, "It has been truly a great experience being able to give back to the youth and work to instill in them a passion and sense of direction towards success, as others were able to do for me. I love trying to deter them from the many obstacles which could cripple their growth."



Bridgeport Rescue Mission Delivers Hot Meals Every Friday Evening!

On Friday November 4, Bridgeport Rescue Mission's Mobile food truck began providing hot, take-home meals in Roodner Court Learning Center parking lot! Meals are served at 6:00pm on Fridays. Bridgeport Rescue Mission works to fight poverty from the inside out, embracing families with love, offering hope and healing for a changed life. Hot meals are available to all people in need, no identification is necessary. Over 150 meals are served each Friday evening.

DOESN'T YOUR FAMILY DESERVE A HOME?

You must be a first-time homeowner or not have owned a residence in the last



NOTICE OF PUBLIC HEARING

The Norwalk Housing Authority will be conducting a Public Hearing regarding its 2012 Public Housing Agency Plan. The Public Hearing will be held on December 5, 2011 at 5:30 p.m. in the community room at Leroy Downs Apartments, 26 Monroe St., Norwalk, CT. Proposed documents are available from 9:00 a.m. to 5:00 p.m. business days for review at the Norwalk Housing Authority Central Office, 24½ Monroe Street, Norwalk and on norwalkha.org under **NEWS**. EHO



Seniors! Holiday Breakfast Just For You!

You are cordially invited to attend a Holiday Breakfast hosted by Norwalk Housing Authority staff! This **FREE** event will take place on Wednesday, Dec. 22, 2011 from 9:30am-11:30am. **Menu will include:**

Breakfast Sausage, Scrambled Eggs, Fruit

Salad, Muffins/Danish, Coffee, Tea, and Orange Juice.

You MUST RSVP to Nicole Ruffin at 838-8471 ext. 140 for this event by Friday, Dec. 16, 2011. Breakfast will be served at the following sites:

20 West Avenue, Leroy Downs, Senior Court, Ludlow Village at Ludlow Commons and Irving Freese.

We hope to see you there!

Proposed Smoke Free Housing Policy for NHA

To promote better air quality and the health and safety of residents in its housing programs, the Norwalk Housing Authority proposes to declare all of its Federal residential properties as smoke free effective April 1, 2012 if approved at the Public Hearing on December 5, 2011. Management proposes a Smoke Free Housing Policy for all of management's Federal housing complexes. Residents shall not smoke, or permit any household member, visitor or guest to smoke in or within 20 feet from the Building. Any Resident who smokes, or allows any household member, visitor or guest to smoke in or within 20 feet of the Building shall be subject to termination of tenancy in accordance with Section 11 (b) of this Lease. Upon adoption of this policy by the NHA Board of Commissioners, NHA residents will be required to sign a copy of the smoke free policy.

65% of the air in an apartment comes from other units.

In circumstances where smoking is observed and/or reported, NHA will seek the specific source of the tobacco or other smoke and take appropriate action consistent with the enforcement of this policy. NHA will assist in locating cessation programs for residents who want to. Medicare and V.A. cover smoking cessation and offer

TO: ALL RESIDENTS

RE: SMOKE FREE HOUSING MEETING TONIGHT

DATE: NOVEMBER 21, 2011

PLEASE NOTE THAT THE MEETING PLACE HAS
BEEN CHANGED FROM ELY SCHOOL AT 6:30pm

TO ROODNER COURT LEARNING CENTER
OFFICE AT 6:30pm TONIGHT

PLEASE PLAN TO ATTEND AS YOUR INPUT IS
IMPORTANT TO US

IF YOU ARE UNABLE TO ATTEND TONIGHT
PLEASE COME ON EITHER:

NOV. 28 6:30pm WASHINGTON VILLAGE
COMMUNITY ROOM OR

NOV.29 6:30pm LEROY DOWNS
COMMUNITY ROOM

THANK YOU

NORWALK HOUSING AUTHORITY

Memo

To: Residents
From: Kras Carlucci, Director of Housing Operations
Date: 11/30/2011
Re: IMPORTANT MEETING

To insure the air quality and health of residents in Norwalk Housing Authority's housing programs, we propose to declare all our residential properties as smoke free effective April 1, 2012 as part of NHA's PHA Plan.

A lease change is proposed that prohibits smoking within twenty (20) feet of any building located on NHA properties and smoking will not be permitted anywhere inside properties owned by NHA to include but not limited to resident dwellings, common areas, hallways, maintenance buildings and NHA office. This policy will apply to all residents, guests, employees and contractors.

Speakers from the American Lung Association will be present to present informative materials towards helping you attain a healthy smoke free lifestyle, as well as providing information on cessation programs.

There will be a public hearing on the PHA Plan December 5, 2011 at 5:30 pm at Leroy Downs Community Room.

Meetings will be held as follows:

November 18, 2011

Leroy Downs	10:00 am	Community Room
20 West	11:30 am	Community Room
Senior Court	1:00 pm	Community Room
Ludlow Village	2:30 pm	Community Room
Freese / Shostak	4:00 pm	Community Room

November 21, 2011

Roodner Court	6:30 pm	Ely School
Meadow Gardens		

November 28, 2011

Washington Village	6:30 pm	Washington Village
King Kennedy		
Elmwood		
Fort Point		

November 29, 2011

Chapel Street	6:30 pm	Leroy Downs Community Room
356 Main Ave		
Fairfield Ave.		



November 15, 2011

Este Es un aviso importante. Favor mandarlo traducir.
Ca ce you bagay ki impotant. Fe yo traduit li pou ou sous ple.
C'est une annonce tres important. Faite la traduction s'il vout plait.

To all Tenants:

CESAR RAMIREZ
Chairman

JEFFREY INGRAHAM
Vice Chairman

BERNADINE TATEM
Treasurer

BEVERLY KRIEGER
Commissioner

LARRY A. KATZ
Commissioner

CURTIS O. LAW
Executive Director

CANDACE E. MAYER
Deputy Director

LATTARULO LAW FIRM, LLC
General Counsel

UNITED WAY
COMMUNITY PARTNER

RE: Non-Smoking Policy

Smoking is prohibited anywhere inside all buildings owned by NHA including but not limited to resident dwellings, common areas, hallways, maintenance buildings, learning centers and the NHA central office. Smoking is also prohibited within twenty (20) feet of any such structure. This policy applies to all residents, guests, and employees, contractors and business invitees who provide services to NHA or any of its properties. This policy is effective April 1, 2012.

Are you a smoker? Yes _____ No _____

Do you support this policy? Yes _____ No _____

Print Name: _____

Development: _____

Pease return to NHA by December 1, 2011.

Thank you.

Sincerely

Kras Carlucci,
Director of Housing Operations

Housing Authority of the City of Norwalk
P.O. Box 508, 24 1/2 Monroe Street, Norwalk, Connecticut 06856-0508
Phone 203-838-8471 • Fax 203-838-6535 • TDD 1-800-545-1833 ext. 437
www.norwalkha.org
AN EQUAL OPPORTUNITY EMPLOYER

Norwalk Housing Authority
EIV
Enterprise Income Verification
Policy & Procedures

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ENTERPRISE INCOME VERIFICATION (EIV) POLICY AND PROCEDURES

Purpose

The purpose of this policy is to provide instruction and information on the acceptable use, disposition, and storage of data obtained through the Enterprise Income Verification (EIV) System. The purpose of the EIV system is to streamline the verification process and help minimize the need for third-party verification. These policies and procedures are based on notice H 2010-10 used as reference.

Policy

The EIV system can be used to identify the following:

- Applicants currently receiving HUD assistance
- Quarterly Earned Income, Social Security and Unemployment Compensation benefit amounts
- New employment
- Multi-subsidy for household members in Public Housing, Multi-family housing and the Section 8 Housing Choice Voucher Program
- Deceased household member

The verification hierarchy will be used when necessary, for example, if the EIV system is not available or if no information is available in the EIV system. EIV information is confidential and will only be used for the intended purpose of verifying eligibility and level of assistance. EIV will only be viewed by those authorized. The EIV data is subject to the provisions of the Federal Privacy Act of 1974 (5 U.S.C. 552, as amended by Public Law No. 104-231, 100 Stat. 3048), the Freedom of Information Act (5 U.S.C. 552, as amended by Public Law No. 104-231, 100 Stat. 3048) and any related amendments.

Privacy Act Requirements

Whenever Owner/Agent requests information about a tenant, the following procedures are required:

1. The income data is only used for verification of tenant income to determine the level of assistance that they are entitled to receive.
2. Information is not disclosed in any way that would violate the privacy of the individuals represented in the system.
3. The tenant is notified of the following:
 - a. HUD or Owner/Agent's authorization and purpose for collecting the information,
 - b. The uses that may be made of the data collected, and
 - c. The consequences to the individual for failing to provide the information.

4. Upon request in writing, the tenant is provided access to records pertaining to them and an opportunity to correct or challenge the contents of the records.

Definitions

Coordinator	Owner/Agent employee designated by the Owner who is responsible for authorizing access to WASS and designated to monitor and ensure users' EIV compliance.
Authorized User	Owner/Agent employee who needs to know the information and has been given WASS access.
Improper Disclosure	The viewing or removal of EIV data by an unauthorized individual.
Need-to-Know	Criterion used in security procedures that requires the custodians of secure information to establish that the intended recipient must have access to the information to perform his or her official duties.
Proper Disposal	Disposal of EIV information by shredding.
Secure System WASS User ID	A secure ID issued to a user, enabling access to the system
WASS	HUD's Web Access Security System (secure connection / secure systems)

Staff Roles

1. Owner: Appoints the EIV Coordinator. Must provide a written approval letter for the EIV Coordinator.
2. Coordinator: The EIV Coordinator must complete a Coordinator Access Authorization Form (Form CAAF). The EIV Coordinator will provide each authorized user a HUD User Access Authorization form (UAAF), the Rules of Behavior, and the User Agreement/Security Awareness Training Questionnaire. Each user will have a User ID and Password. The EIV Coordinator is responsible to ensure that all authorized users are utilizing and safeguarding the EIV information. This includes but is not limited to:
 - a. Maintain a log of all authorized users.
 - b. Assign properties.
 - c. Re-certify all EIV users.
 - d. Ensure that staff take the annual EIV Security Awareness Training and Certificate of completion is maintained in EIV user file. User guides and security procedures are available, electronically, in NHA's shared drive.
 - e. Record and report improper disclosure in accordance with the improper disclosure procedures.
 - f. Ensure that data is secure, including whenever an employee who had access is no longer employed by NHA.
 - g. Ensure confidentiality of information displayed on monitors.
 - h. Ensure confidentiality of printed EIV reports.
 - i. Monitor files storage areas.
 - j. Monitor the disposal of EIV information.

3. EIV Users: Must be a member of NHA staff, authorized by NHA, and shall have access on a need-to-know basis as per this policy/procedure. Once a need-to-know situation no longer exists, the authorization will be immediately terminated.
 - Must complete the User Access Authorization Form (Form UAAF), including the Rules of Behavior
 - Must complete the Security Awareness Training Questionnaire
 - Must update their passwords in accordance with HUD EIV requirements
 - May never share user ID or password with another individual

Disclosure of EIV System to Tenant

At move-in and thereafter at each certification, NHA will disclose at the tenant briefing to the prospective resident/participant or housed resident/participant its intent to use the EIV system. This will include the following:

1. An explanation of EIV procedure.
2. Distribution and discussion of the HUD EIV and You Brochure.
3. Collect a properly executed, current HUD-9887 and 9887a form for Multifamily Housing or HUD-9886 for Public Housing and the Section 8 Housing Choice Voucher Program, for all household members 18 years of age or older.
4. Discuss that all EIV data will be kept in a secure environment.
5. Inform them that all EIV data will be disposed of by shredding.

SECURITY MEASURES:

The authorized users of the EIV system will adhere to the following procedures:

- EIV reports will be kept in the tenant file, which will remain secure at all times. A sign is posted on the file room that states "Authorized Personnel Only". If an authorized user of EIV is working on a particular file, the file will be secured in their office when they are absent from their office.
- EIV users are prohibited from sharing their EIV computer log-in and password information.
- EIV users will never leave EIV data displayed on their computer screens. If an authorized EIV user is viewing EIV data and an unauthorized person approaches the work area, the authorized user will minimize or close the EIV screen.
- EIV users shall not save any EIV data to a computer hard drive or any other automated information system. Information will not be e-mailed but if absolutely necessary will be encrypted.
- EIV users shall not override the authorized access levels by providing EIV data to others who have limited or no access to the data.
- EIV users shall only print to the designated printers located within the confidential areas. All EIV information in printed format will be promptly removed from printer trays, will not be left unattended, or left within viewing distance of unauthorized personnel or visitors and will be properly filed in a secure filing cabinet.
- Once the EIV data has been printed and used for income verification purposes, it will be placed in the tenant file which will be kept in the cabinets in the locked filing room or locked cabinets in offices. Inactive files will be kept for three years and then they will be shredded.

- EIV information will only be discussed with others on a “need-to-know” basis. EIV information is protected at the individual level. Specific information pertaining to one family member will not be discussed in the presence of other family members or individuals who do not have a need-to-know.
- Improper disclosures of EIV information, unauthorized access or a known security breach shall be reported directly to the Executive Director. The Executive Director shall investigate all reported incidents and if improper disclosure has occurred, disciplinary action will be taken immediately. All incidents will be documented and placed in the employee’s personnel file.
- These security measures have been and will continue to be discussed at staff meetings.
- EIV data will be disposed of by cross-cut shredding.

USE OF EIV REPORTS

Income Report: Shows wages for past and current employment, unemployment, SS/SSI, and Medicare. Data will not be accessed until after execution of form HUD-9887 and HUD-9887a or HUD-9886, depending on the program, by NHA and each household member age 18 and over. If the tenant disputes the amount included in the report, they must sign a certification that the information is incorrect. The Occupancy/Section 8 Specialist will follow the guidance in the 4350.3 Handbook, ACOP, or the Administrative Plan, depending on program, to obtain documentation of income (such as, 6 consecutive current pay-stubs, Social Security benefits award letters, copies of tax returns, etc.).

If the tenant does not provide requested information either because they do not have the requested information or they refuse to provide the information, NHA must obtain verification of the information from the third party source. NHA may reject any tenant-provided documentation, if they deem the information to be unacceptable.

Existing Tenant Search: Shows whether an applicant is currently receiving HUD housing assistance. The Admission Specialist will conduct this search for all applicants prior to occupancy. Subsidy will not be paid for the same family in two locations. This report will be used to coordinate with another location the move-out and move-in dates.

Failed EIV Pre-Screening Report: This report shows any tenants who failed the identity match. The Occupancy/Section 8 Specialist will run report monthly and must correct the errors before Social Security Administration (SSA) can match and send tenant information. The Occupancy/Section 8 Specialist will verify and correct information on every tenant/participant listed as having the failed pre-screening. Tenant/participant file will be documented with actions taken.

Failed Verification Report: This report shows family members with incorrect Social Security Numbers, date of birth, last name, as well as deceased household members. The Occupancy/Section 8 Specialist will verify that the documentation in the tenant file matches the tenant’s personal identifiers. If an error has occurred, the appropriate correction must be made to the most recent certification. If there are inaccuracies, the Occupancy/Section 8 Specialist will encourage the tenant to contact the Social Security Office to correct the information. The Occupancy/Section 8 Specialist will document the tenant/participant file with the measures taken to correct this information.

Multiple Subsidy Report: This report is used to search within TRACS and PIC to identify individuals who may be receiving multiple subsidies. Management will run this report monthly. An investigation will be made for every current tenant who appears to be receiving multiple subsidies. Tenant/participant file will be documented with results.

Deceased Tenant Report

This report provides information of any current tenant who is listed as deceased with the Social Security Administration. The Occupancy/Section 8 Specialist will run report monthly.

Single Deceased Household: For deceased single member households, the Housing Authority will list the date of death as the last day of the month, in which the death occurred. The Housing Authority is required to then classify the unit as vacant in PIC or TRACS. The Housing Authority may not use a later date based on the date that all personal belongings were removed from the unit by the family. The Housing Authority may coordinate the removal of personal belongings within a reasonable time frame (not to exceed 14 days). In situations where the Housing Authority seeks judicial intervention to regain possession of the unit, the Housing Authority must list the eviction date (the day in which the Housing Authority has regained possession of the unit) as the effective date of action. In the Section 8 Program, the date of death will be listed as the last day of the month in which the death occurred.

Deceased HOH with Minors: In dealing with a deceased tenant which is the Head of the Household and the remaining household members are minors, the Housing Authority will allow a temporary guardian to reside in the unit until a court-appointed guardian is established. In accordance with the Housing Authority's screening policy, the Housing Authority may add the new guardian as the new Head of Household.

Deceased HOH with Live-In Aide: If the deceased Head of the Household dies and the only remaining household member is the live-in aide, the live-in aide is not entitled or eligible for any rental assistance or continued occupancy. The Housing Authority may not designate the live-in aide as the new head of household nor pay HAP on behalf of the live-in aide for any month after the month in which the tenant died. The Housing Authority must notify the live-in aide s/he is required to vacate the unit at the end of the month.

Individual Misidentified as Deceased: In the event a tenant or household member is misidentified as deceased on the Deceased Tenants Report, the Housing Authority will immediately notify the individual in writing and advise the individual to contact SSA so SSA can correct its records. The individual may contact SSA or visit his/her local SSA office for assistance. Tenant/participant file will be documented with details of efforts to correct.

Income Discrepancy Report: Shows differences between EIV and reported income. The EIV system was established to reduce errors in income reporting. Currently, HUD has determined that when the EIV income data differs from the tenant-provided income by at least \$200.00 per month, this constitutes a "substantial difference." Therefore any increase of \$200.00 or more per month will constitute an interim. The Occupancy/Section 8 Specialist will run this report consistently for all subsidized tenants at recertification. He/She will follow-up on every reported income discrepancy included in this report and it will be discussed with the tenant/participant. If fraud is suspected, the Occupancy/Section 8 Specialist will also follow the guidance in 4350.3 Handbook, ACOP, or Administrative Plan. Handling of discrepancy reports should be followed as indicated in the policy

and the tenant/participant file will be documented with all correspondence related to the income discrepancy.

Handling of Discrepancy Reports

All EIV Discrepancy Reports will be handled in the following manner:

- A) If resident/participant disagrees with the Discrepancy Report issued by the EIV system, the Occupancy/Section 8 Specialist will discuss with the tenant/participant to resolve dispute. All tenant-provided and submitted documentation should be currently dated (not more than 60 days previous to the initial resolution meeting). Discrepancies must be reviewed and resolved at the time of recertification or within 30 days.
- B) If a situation arises where facts indicate that a resident/participant has unreported or under-reported income, a repayment agreement will be executed between the resident/participant and Norwalk Housing Authority, and a revision to the current and future rental payments/HAP payments will be made. If a resident/participant refuses to enter into a repayment agreement and/or refuses to pay the newly calculated rent, termination of assistance shall occur using the established policies of the Multifamily, Public Housing and Section 8 Programs.

For details please refer to:

ACOP: Chapter 13, Section E: Repayment Agreement for Families.

Administrative Plan: Chapter 16, Part IV.B: Repayment Policy.

HUD Handbook 4350.3 Rev. 1: Chapter 8, Paragraph 8-20: Reimbursement to HUD for Overpayment of Assistance.

No Income Report: Shows any current tenant who has no income reported. Occupancy/Section 8 Specialist will run this report at recertification and quarterly for all zero income tenants. He/She will follow established procedures for zero-income tenants as this report shows no income was found in the available databases, but it is not used as documentation of zero-income.

New Hires Report: Provides employment information for tenants who have started new jobs. Occupancy/Section 8 Specialist will run this report consistently for all subsidized tenant monthly. He/She will follow-up on any current tenant who has obtained employment since last certification, will discuss with the tenant/participant, obtain verification and make appropriate rent/subsidy and effective date correction. If the tenant/participant disputes the information, they must sign a certification that they dispute the information. If fraud is suspected, the Occupancy/Section 8 Specialist will follow guidance in HUD Handbook 4350.3, ACOP or the Administrative Plan. Tenant/participant file will be documented with all correspondence related to the new hire.

Retroactive Repayment of HAP by Owners (Section 8 Program)

If an owner receives HAP for any month in which the owner is ineligible to receive HAP because of a deceased tenant, the Housing Authority must immediately notify the owner in writing of the ineligible HAP and require the owner to repay the overpayment to the Housing Authority within 30 days. If the owner does not comply, the Housing Authority may deduct the amount due to the Housing Authority from any amounts due to the owner under any other HAP contract. If there is no other HAP contract with the owner, the PHA may seek and obtain additional relief by judicial order or action in accordance with state and local laws.

To demonstrate compliance with mandatory EIV use, Norwalk Housing Authority must retain in the tenant/participant file the following:

- For each annual re-exam:
 - ☒ Income Report
- For each interim re-exam:
 - ☒ No income discrepancy
 - ☒ Income discrepancy
- For each New Admission:
 - ☒ Income Report
 - The Admission Specialist must review the Income Report to confirm/validate family-reported income within 90 days of the admission date
 - Any income discrepancies must be resolved with the family within 30 days of the Income Report date
- For each Historical Adjustment:
 - ☒ Income Report
 - The Occupancy/Section 8 Specialist must review the Income Report to confirm/validate family-reported income within 90 days of the PIC or TRAC submission date
 - Any income discrepancies must be resolved with the family within 30 days of the Income Report date

DOCUMENTATION TO BE MAINTAINED FOR USE OF THE EIV SYSTEM

The following documents related to EIV access, authorizations or security must be maintained and available for auditing purposes:

- EIV Coordinator Access Authorization Form(s) signed original copy
- EIV User Access Authorization Form(s) signed original copy
- EIV Owner Approval letter(s) and
- EIV Security Awareness Training Questionnaire
- EIV bi-annual user certification

This Enterprise Income Verification Policy shall be utilized for Public Housing, Multi-Family and Section 8 Housing Choice Voucher Programs.

Curtis O. Law, Executive Director

Date

**Financial Resources:
Planned Sources and Uses April 1, 2012 – March 31, 2013**

Sources	Planned \$	Planned Uses
1. Federal Grants		
a) Public Housing Operating Fund	3,680,000	
b) Public Housing Capital Fund	1,180,000	
c) HOPE VI Revitalization	N/A	
d) HOPE VI Demolition	N/A	
e) Annual Contributions for Section 8 Tenant-Based Assistance	9,398,973	
f) Public Housing Drug Elimination Program (including any Technical Assistance funds)	N/A	
g) Resident Opportunity and Self-Sufficiency Grants	0	
h) Community Development Block Grant	60,000	Public Housing Improvements
i) ROSS/Neighborhood Networks	0	
Other Federal Grants (list below)	138,000	FSS/Homeownership Coordinators
Mod Rehab (162 units)	2,707,000	
Single Room Occupancy (8 units)	86,600	
New Construction	N/A	
Multi-Family Drug Elimination	N/A	
2. Prior Year Federal Grants (unobligated funds only) (list below)		
3. Public Housing Dwelling Rental Income		
Dwelling Rental Income	2,522,127	Operations
4. Other income (list below)		
Interest on General Fund Investments	9,000	Operations
Section 8 Administrative Fees	827,000	Operations
4. Non-federal sources (list below)		
State Multi-Family (278 units)	4,972,000	Housing
St of CT DOE	150,000	
Total Resources	25,730,700	

NORWALK HOUSING AUTHORITY								
FEDERAL ASSET MANAGEMENT PROJECTS (AMPS)				853				
FYE MARCH 31, 2013								
	amp 99	amp 1	amp 2	amp 3	amp 4	amp 5	amp 6	amp 7
units		136	218	60	100	103	146	90
		15.94%	25.56%	7.03%	11.72%	12.08%	17.12%	10.55%
							MEADOW 54	
							CHAPEL 29	LUDLOW 30
	Central	WASH	ROODNER	SENIOR	FREESE 60	DOWNNS 49	SEAVIEW 38	FAIRFIELD 29
	Office	VILLAGE	COURT	COURT	SHOSTAK 40	20 WEST 54	MAIN 25	KING 31
OPERATING RECEIPTS:								
Dwelling Rental		504,125	636,996	180,353	259,164	333,794	322,053	285,642
Interest Income		900	1,400	350	650	600	1,000	900
Other Income	111,000	23,005	28,295	12,129	16,796	17,067	28,231	11,901
Allocated Costs	916,224							
TOTAL OPER. RECEIPTS	1,027,224	528,030	666,691	192,832	276,610	351,461	351,284	298,443
OPERATING EXPENSE:								
Allocated Costs		146,080	234,158	64,447	107,412	110,634	156,822	96,671
ADMINISTRATIVE EXP								
Salaries	527,826							
Benefits	248,078							
Legal	6,000	22,000	56,000	2,800	5,100	5,500	35,000	16,000
Training	8,000	1,500	2,200	450	1,100	1,200	1,300	500
Travel	9,600	600	800	200	200	1,100	600	200
Accounting		2,712	4,348	1,196	1,994	2,054	2,911	1,196
Sundry	133,000	12,000	29,000	4,800	11,000	22,000	10,000	6,000
TOTAL ADMINISTRATIVE	932,504	38,812	92,348	9,446	19,394	31,854	49,811	23,896
Salaries		117,817	193,936	13,879	22,097	29,594	121,939	56,702
Benefits		55,374	91,150	6,523	10,386	13,909	57,311	26,650
Tenant Services		20,563	22,000	9,800	15,500	49,000	12,000	17,500
Total Tenant Services	-	193,754	307,085	30,202	47,983	92,504	191,250	100,852
UTILITIES								
Water	1,800	33,661	100,597	5,302	8,000	18,863	38,090	24,644
Electricity	28,800	71,920	44,966	11,402	37,183	92,961	17,908	69,987
Gas	3,800	88,010	150,659	31,674	54,369	17,224	3,695	154
Fuel		-	-	-	-	-	5,714	40,806
Performance contract		8,400	18,000	8,400	7,800	4,800	2,100	2,400
TOTAL UTILITIES	34,400	201,991	314,222	56,778	107,352	133,848	67,507	137,991
ORDINARY MAINTENANCE								
Labor	-	134,724	212,229	67,724	81,983	103,932	161,216	130,951
Labor Benefits	-	63,320	99,748	31,830	38,532	48,848	75,772	61,547
Materials	16,000	21,000	188,000	5,400	4,800	7,700	20,000	9,000
Contract Costs	22,000	78,000	215,000	33,600	42,000	60,000	109,000	47,000
TOTAL MAINTENANCE	38,000	297,044	714,977	138,554	167,315	220,480	365,988	248,497
GENERAL EXPENSE								
insurance	15,600	98,733	121,000	28,000	48,000	42,000	87,000	48,000
pilot		30,213	32,277	12,357	15,181	19,995	25,455	14,765
depreciation		5,000	3,680	1,013	1,688	1,739	2,465	1,519
collection loss		9,000	5,000	1,500	500	2,000	5,000	1,000
EXTRAORDINARY MAINT.	6,000	14,000	16,000	5,000	4,000	5,000	15,000	10,000
TOTAL EXPENDITURES	1,026,504	1,034,628	1,840,748	347,298	518,825	660,054	966,297	683,192
100%								
Subsidy		533,956	1,131,773	187,026	368,080	346,109	639,968	401,103
NET RECEIPTS (DEFICIT)	721	27,358	(42,284)	32,560	125,865	37,516	24,955	16,354

Attachment D: Flat Rents for Public Housing 2012

EFFECTIVE APRIL 1, 2012

	Apr-11	Apr-12	Apr-11	Apr-12	Apr-11	Apr-12	Apr-11	Apr-12	Apr-11	Apr-12	Apr-11	Apr-12
	0BR	0BR	1BR	1BR	2BR	2BR	3BR	3BR	4BR	4BR	5BR	5BR
WASHINGTON VILLAGE			666	666	863	863	1,214	1,214				
ROODNER COURT			584	584	716	716	795	795	1,584	1,584	1,893	1,893
SENIOR COURT	593	593	758	758								
IRVING FREESE			758	758	950	956						
LEROY DOWNS	462	462	677	677	1,071	1,071						
JOHN SHOSTAK			844	844								
20 WEST AVENUE			784	784								
KING KENNEDY			774	774	1,194	1,194	1,611	1,611	1,760	1,760		
MEADOW GARDENS							1,611	1,611				
SEAVIEW			963	963	1,236	1,236						
ELMWOOD							1,668	1,668				
FAIRFIELD AVENUE	652	652	935	935	1,233	1,233						
CHAPEL STREET					1,260	1,260	1,530	1,530				
MAIN AVENUE							1,889	1,889				
LUDLOW VILLAGE	605	605	625	625								
AVERAGE NHA FLAT RENT	569	569	774	774	1,065	1,066	1,474	1,474	1,672	1,672	1,893	1,893
HUD FMR(October 1st prio yr)	1,190	1,162	1,449	1,415	1,811	1,769	2,360	2,305	2,851	2,784	3,279	3202

ATTACHMENT E: HCV (Section 8) PAYMENT STANDARDS 2012

The payment standards were determined by averaging ten different units in both low and high income census tract areas for each bedroom size. The utilities were determined by using the highest amount from each bedroom size categories. The two numbers were then added together to determine the payment standard.

Each payment standard schedule must have payment standards set within 90 to 110% of the current published FMR unless approved by HUD.

The NHA Payment Standards effective January 1 2012 are as follows:

Low Income Census Tracts Payment Standard 432, 434, 437, 438, 440, 441, 442, 444, 445	Middle and Upper Income Census Tracts Payment Standard 425, 426, 427, 428, 429, 430, 431, 433, 435, 436, 439, 443, 446
0 Bedroom- Low	0 Bedroom High
1,111	1,275
1 Bedroom –Low	1 Bedroom -High
1,310	1,550
2 Bedrooms – Low	2 Bedrooms -High
1,800	1,930
3 Bedrooms –Low	3 Bedrooms -High
2,217	2,530
4 Bedrooms –Low	4 Bedrooms -High
2,575	3,050

Attachment F: Utility Allowances

								UTILITY ALLOWANCES 4/1/2012		
Proj. Name	AMP #	# of BR	# of Units	ccf	\$	kwh	\$	\$	STOVES & REF 16	ADJUSTED
Washington Village SNEW	1	1 BR	35	0	\$0	267	\$51	\$51	\$16	\$ 67
		2 BR	70	0	\$0	311	\$58	\$58	\$16	\$ 74
		3 BR	31	0	\$0	362	\$66	\$66	\$16	\$ 82
		136								
Roodner Court CL&P	2	1 BR	22	0	\$0	280	\$59	\$59	\$16	\$ 75
		2 BR	79	0	\$0	346	\$69	\$69	\$16	\$ 85
		3 BR	78	0	\$0	405	\$78	\$78	\$16	\$ 94
		4 BR	26	0	\$0	461	\$87	\$87	\$16	\$ 103
		5 BR	13	0	\$0	509	\$94	\$94	\$16	\$ 110
218										
Senior Court CL&P	3	0 BR	20	0	\$0	257	\$56	\$56	\$16	\$ 72
		1 BR	40	0	\$0	278	\$59	\$59	\$16	\$ 75
60										
Irving Freese CL&P	4	1 BR	59	0	\$0	281	\$59	\$59	\$16	\$ 75
		2 BR	1	0	\$0	350	\$70	\$70	\$16	\$ 86
60										
John Shostak CL&P	4	1 BR	40	0	\$0	656	\$117	\$117	\$16	\$ 133
		40								
Leroy Downs SNEW	5	0 BR	20	0	\$0	258	\$49	\$49	\$16	\$ 65
		1 BR	26	0	\$0	268	\$51	\$51	\$16	\$ 67
		2 BR	3	0	\$0	328	\$60	\$60	\$16	\$ 76
49										
20 West	5	1BR	54						\$16	\$ 16
		54								
Meadow Gardens SNEW & YANKEE	6	3 BR	54	98	\$171	317	\$59	\$229	\$16	\$ 245
		54								
Seaview TTD	6	1 BR	11	0	\$0	1010	\$186	\$186	\$16	\$ 202
		2 BR	23	0	\$0	1488	\$267	\$267	\$16	\$ 283
		34								
Elmwood SNEW	6	3 BR	4	0	\$0	1920	\$318	\$318	\$16	\$ 334
		4								
Chapel Street CLP & YANKEE	6	2 BR	18	26	\$56	760	\$133	\$189	\$16	\$ 205
		3 BR	11	31	\$64	1085	\$183	\$247	\$16	\$ 263
29										
Main Avenue CLP & YANKEE	6	3 BR	25	71	\$128	401	\$78	\$206	\$16	\$ 222
		25								
Fairfield Avenue SNEW	7	0 BR	4	0	\$0	256	\$49	\$49	\$16	\$ 65
		1 BR	4	0	\$0	286	\$54	\$54	\$16	\$ 70
		2 BR	21	0	\$0	344	\$63	\$63	\$16	\$ 79
29										
King Kennedy SNEW & YANKEE	7	1 BR	2	30	\$63	310	\$57	\$120	\$16	\$ 136
		2 BR	3	38	\$76	409	\$73	\$149	\$16	\$ 165
		3 BR	18	59	\$109	469	\$83	\$192	\$16	\$ 208
		4 BR	8	77	\$138	525	\$92	\$230	\$16	\$ 246
31										
Ludlow Village TTD		0 BR	22	0	\$0	605	\$118	\$118	\$0	\$ 118
		1 BR	8	0	\$0	605	\$118	\$118	\$0	\$ 118

Norwalk Housing Authority Charges Effective 4/1/2012:

<u>PLUMBING – PL 1000</u>	<u>PARTS COST</u>	<u>LABOR COST</u>	<u>TOTAL COST</u>
Replace sink stopper	\$7.00	\$35.36 – 1 hour	\$42.36
Replace bathtub diverter	\$7.00	\$35.36 – 1 hour	\$42.36
Replace toilet handle	\$7.00	\$35.36 – 1 hour	\$42.36
Replace faucet – kitchen	\$32.00	\$70.72 - 2 hours	\$102.72
Replace faucet – bathroom	\$22.00	\$70.72 - 2 hours	\$92.72
Replace toilet	\$300.00	\$141.44 - 4 hours	\$441.44
Replace handicapped toilet	\$182.00	\$141.44 - 4 hours	\$323.44
Replace toilet seat	\$26.00	\$35.36 – 1 hour	\$61.36
Replace handicap toilet seat	\$32.00	\$35.36 – 1 hour	\$61.36
<u>CLEARING OF STOPPAGES</u>			
(RESIDENT CAUSED BY FOOD/GREASE/ETC.)			
Monday-Friday		\$70.72	
Saturday		\$106.08	
Sunday		\$141.44	
Mainline Stoppage		No Charge	
 <u>ELECTRIC – EL2000</u>			
Replace outlet	\$6.00	\$35.36 - 1 hour	\$41.36
Replace switch	\$6.00	\$35.36 - 1 hour	\$41.36
Replace light switch cover	\$2.00	\$35.36 - 1 hour	\$38.36
Replace hall light fixture	\$42.00	\$35.36 - 1 hour	\$77.36
Replace smoke detector	\$51.00	\$35.36 - 1 hour	\$86.36
Replace smoke detector battery	\$3.00	\$35.36 - 1 hour	\$38.36
Intercom repairs	Actual Cost	Actual Cost	
Replace exit light	\$122.00	\$70.72 - 2 hours	\$192.72
Replace globe	\$17.00	\$35.36 - 1 hour	\$52.36
Replace light bulb	\$3.00	\$17.68– 1/2 hour	\$20.68
Replace fluorescent light bulb	\$14.00	\$17.68 - 1 hour	\$31.68
 <u>CARPENTRY – CA3000</u>			
Wall repair	\$17.00	Actual Hours @ 35.36	
Replace interior door	\$45.00	\$70.72 - 2 hours	\$115.72
Replace interior door knob	\$22.00	\$35.36 - 1 hour	\$57.36
Replace closet door	\$45.00	\$70.72 - 2 hours	\$115.72
Replace closet door knob	\$22.00	\$35.36 - 1 hour	\$69.36
Replace closet rod pole	\$12.00	\$35.36- 1 hour	\$47.36
Replace closet storage/shelf system	\$122.00	\$70.72 - 2 hours	\$192.72

PAINT – PA 4000**PARTS COST****LABOR COST****TOTAL COST**

Repaint (graffiti)	\$ 32.00	Actual hours	
Paint unit			
Bedrooms			
0	\$62.00	\$185.00 or actual hrs	
1	\$122.00	\$375.00 or actual hrs	
2	\$142.00	\$400.00 or actual hrs @ 32.88 PH	
3	\$162.00	\$420.00 or actual hrs	
4	\$192.00	\$375.00 or actual hrs	
5	\$242.00	\$350.00 or actual hrs	

APPLIANCES – AP5000**NHA Stoves**

Oven door handle	\$34.00	\$35.36 - 1 hour	\$69.36
Oven knob	\$10.00	N/C	
Broiler door handle	\$47.00	\$35.36 - 1 hour	\$82.36
Range hood filter	\$4.00	\$35.36 - 1 hour	\$39.36
Replace stove	\$342.00	\$70.72 - 2 hours	\$412.72

NHA Refrigerators

Handle	\$57.00	\$35.36 - 1 hour	\$92.36
Replace refrigerator	\$442.00	\$70.72 - 2 hours	\$512.72

HARDWARE – HW6000

Replace building entry door	\$652.00	\$212.16 - 6 hours	\$864.16
Replace building entry door closer	\$127.00	\$70.72 - 2 hours	\$197.72
Replace building entry door - panic bar	\$652.00	\$106.08 - 3 hours	\$758.08
Replace building entry door – grab bar	\$137.00	\$70.72 - 2 hours	\$207.72
Replace building entry door lock	\$57.00	\$35.36 - 1 hour	\$92.36
Replace building entry door knob	\$22.00	\$35.36 - 1 hour	\$57.36
Replace apt. entry door	\$352.00	\$212.16 - 6 hours	\$564.16
Replace apt. entry door striker plate	\$3.00	\$34.00- 1 hour	\$38.36
Replace apt entry door cylinder lock	\$18.00	\$34.00 - 1 hour	\$53.36
Replace apt. entry door lock	\$57.00	\$34.00 - 1 hour	\$92.36
Replace apt. door key	\$12.00	\$34.00 - 1 hour	\$47.36

MAILBOXES – MB7000

Replace doors	\$37.00	\$35.36 - 1 hour	\$72.36
Replace keys	\$12.00	\$35.36 - 1 hour	\$47.36
Replace lock	\$17.00	\$35.36 - 1 hour	\$52.36
Replace mailbox	\$77.00	\$35.36 - 1 hour	\$112.36

LABOR RATES	Laborer	Mechanic	Supervisor
Normal Business Hours (8:00 a.m.-4:30 p.m.)	\$31.20	\$35.36	\$37.96
4:30 pm.-8:00 a.m. (Mon.-Fri.)	\$93.60	\$106.08	\$113.88
Saturday	\$93.60	\$106.08	\$113.88
Sunday and Holidays	\$124.80	\$141.44	\$151.84

LOCK-OUTS

	<u>SET RATE</u>
Day time service call	\$35.36
Night time service call	\$106.08
Saturday service call	\$106.08
Sunday and Holidays service call	\$141.44

MISCELLANEOUS

	<u>SET RATE</u>
Abandoned cars registered to anyone on lease	\$160.00
A/C charge for 20 West Ave. residents only	\$81 per year or \$6.75 per month
A/C installation/removal	1 hour labor
Bike storage/removal	\$16.00 per day
Replace hallway Carpet sq. yd.	Actual Cost
Cleaning hallway carpet 30 sq.ft.	Actual Cost
Unauthorized pets	\$200.00
Cleaning of Carpet	Actual Cost
Drying clothes on fences, decks, etc.	\$40.00
Fence removal	Actual Cost
Graffiti removal - exterior	\$18.00 per sq. ft.
Grass cutting (front and back) Inside Tenant Fencing	\$65.00
Grill removal	\$25.00
Maintenance cleaning hallways & common areas	Actual Cost
Not returning keys on time when transferring	\$20.00 per day
Painting/patching holes in ceiling and wall	\$20.00 per sq. ft.
	Labor and materials
Pet waste removal	\$5.00 for each occurrence
Removal of holiday decorations	\$20.00
Satellite dish removal	\$60.00
Shopping cart removal	\$30.00
Storage/removal of items on fire escape, porches or hallways	\$50.00
Trash removal or household debris left in common areas	\$50.00
(WITH I.D.)	
Blocked Egress 1 st Time	\$50.00
2 nd Time	\$100.00
3 rd Time	Eviction

Painting Unit other than with Light Colors or Wall Paper/Boarders	Actual Cost to Repaint
1 st Time	\$40.00
2 nd Time	\$100.00
3 rd Time	Eviction

MISCELLANEOUS

SET RATE

Trash Found and Identified	1 st Time	\$50.00
	2 nd Time	\$100.00
	3 rd Time	Eviction

Clothes on Deck	\$50.00 per violation
Not Prepared for Bed Bug Extermination	\$175.00
Wand Replacement	\$50.00

GLASS WINDOW

Small	Actual Cost
Medium	Actual Cost
Large	Actual Cost

WINDOW SCREEN & FRAME

Small	\$35.00
Medium	\$45.00
Large	\$55.00

RESCREEN

Small	\$25.00
Medium	\$35.00
Large	\$45.00

RESCREEN PATIO/STORM DOOR

\$35.00

STORM DOOR SCREEN WITH FRAME

\$55.00

Attachment H: List of RAB Members

*Yolanda Dancy, President
Meadow Gardens Complex
49 Meadow Street, Apt. 13
S. Norwalk, CT 06854*

*Tenoi Davis
Samuel Roodner Court
261 Ely Ave, Bldg. 22-2F
S. Norwalk, CT 06854*

*Daisy Franklin
82 So. Main Street, #2S.
S. Norwalk, CT 06854*

*Clara Welfare
Washington Village Complex
1009 Washington Village
S. Norwalk, CT 06854*

*Valencia Kitt
25 Parallel St.
Norwalk, CT 06851*

*Ms. Elaine Lawrence, Vice
President
Washington Village Complex
1112 Washington Village
S. Norwalk, CT 06854*

*Ian Jobe
Meadow Gardens Complex
49 Meadow Street, Apt. 10
S. Norwalk, CT 06854*

*Briggettie Grant, Vice
President
Chapel Street Complex
25 Chapel Street, Apt. D-5
Norwalk, CT 06850*

*Richard Glica
Leroy Downs Apts. Complex
26 Monroe Street, 2-H
S. Norwalk, CT 06854*

*Ora Scott
Samuel Roodner Court
261 Ely Ave, Bldg. 19-1C
S. Norwalk, CT 06854*

*Angela Morales
356 Main Ave Complex
356 Main Ave, Apt. A-5
Norwalk, CT 06851*

*Moravia Langley
6 West Couch Street
South Norwalk, CT 06854*

*Thomasina McClendon
Samuel Roodner Court
261 Ely Ave, Bldg. 15-3F
S. Norwalk, CT 06854*

*Vivian Rice
Leroy Downs Apt
26 Monroe Street, Apt 4-A
S. Norwalk, CT 06854*

*Andrea Kitt
169 South Main St., Unit B
Norwalk, CT 06854*

*Arletha Ephfrom
202-B Washington Village
S. Norwalk, CT 06854*

*Cornelio Ovalle
Samuel Roodner Court
261 Ely Ave, Bldg. 18-1E
S. Norwalk, CT 06854*

*Julia McClester
20 West Ave. Complex
20 West Ave., Apt. 2-P
S. Norwalk, CT 06854*

*Janice Frye
46 Prospect St. #3-H
Norwalk, CT 06850*

*Jewel Maybin
John Shostak Apartments
65 Ward Street, Apt. A-6
Norwalk, CT 06851*

*Wilma Pace
356 Main Avenue
356 Main Avenue, Apt. A6
Norwalk, CT 06851*

*Janice Carter
John Shostak Apts.
65 Ward Street, Apt. A-2
Norwalk, CT 06851*

*Ernesto Morales, President
Chapel Street Complex
25 Chapel Street, Apt. C-1
Norwalk, CT 06850*

*Jose Rodriguez
Samuel Roodner Court
261 Ely Avenue, Apt. 16-3E
S. Norwalk, CT 06854*

Marva Reaves
11 Fort Point Street, Apt. B-9
S. Norwalk, CT 06855

Gladys Vann
Leroy Downs Apt
26 Monroe Street, Apt 1-C
S. Norwalk, CT 06854

Albert Bacher
20 West Avenue Complex
20 West Avenue, Apt. 3K
S. Norwalk, CT 06854

Ms. Deborah Winters
Corresponding Secretary
Washington Village Complex
1001 Washington Village
S. Norwalk, CT 06854

Paul Durham
11 Fort Point Street, Apt. B-7
S. Norwalk, CT 06855

Rose Sellers
Washington Village Complex
1108 Washington Village
S. Norwalk, CT 06854

Planning Process and Public Hearing Comments

In order to ensure comprehensive and detailed input of stakeholders, the NHA held separate meetings with staff, RAB members and members of the Norwalk community interested in and involved with NHA programs and affordable housing.

These meetings were held as follows:

August 25, 2011
September 19, 2011
November 14, 2011

Prior to and after each of these meetings revisions were made to the PHA Plan and comments received by fax, email and in persons were also reviewed and responded to. The draft of the Plan presented at the public hearing incorporated responses made during the public comment period.

The Public Hearing was held on December 5, 2011.

At this hearing the following comments were made:

There was considerable discussion about the proposed Smoke Free Housing Policy. Norwalk Housing Authority held several meetings both centrally with the Resident Advisory Board and at eight (8) NHA developments, inviting all residents to attend. Prior to the Smoke Free meetings, surveys were sent to residents and two hundred and seven (207) responded and only forty (40) opposed implementing the Smoke Free Policy. Eighty percent (80%) of Norwalk Housing Authority residents who responded are in favor of the Smoke Free Housing Policy.

A written comment was received and that stated, *“it’s only fair for the non-smokers and smokers to meet halfway on common ground. No smoking in the common areas and smoking permitted in one’s own domain.”*

There was concern that residents wanted more discussion on the proposed policy. Therefore the NHA Board of Commissioner’s approved the removal of the Smoke Free Policy from the 2012 PHA Plan. The proposed Smoke Free Policy will be addressed early in 2012 and the 2012 PHA Plan may be revised.

Attachment I: Annual Statements 2007-2012

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 4/30/2011

Part I: Summary					
PHA Name: Norwalk Housing Authority		Grant Type and Number Capital Fund Program Grant No: CT 26 P002 50107 Replacement Housing Factor Grant No: Date of CFFP: 9/30/2010			FFY of Grant: 2007 FFY of Grant Approval: 2007
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³	220,000	220,000	220,000	220,000
3	1408 Management Improvements	100,000	100,000	100,000	100,000
4	1410 Administration (may not exceed 10% of line 21)	130,923	130,923	130,923	130,923
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	45,000	45,000	45,000	45,000
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures	814,500	814,500	814,500	814,500
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴ RHF funds shall be included here.

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Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
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U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 4/30/2011

Part I: Summary				FFY of Grant: 2007 FFY of Grant Approval: 2007	
PHA Name: Norwalk Housing Authority		Grant Type and Number Capital Fund Program Grant No: CT 26 P002 50107 Replacement Housing Factor Grant No: Date of CFFP: 9/30/2009			
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 9/30/2010 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2 - 19)	1,310,423	1,310,423	1,310,423	1,310,423
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
Signature of Executive Director		Date 1/9/2012		Signature of Public Housing Director	
				Date	

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.
⁴ RHF funds shall be included here.

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Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 4/30/2011

Part II: Supporting Pages								
PHA Name: Norwalk Housing Authority			Grant Type and Number Capital Fund Program Grant No: CT 26 P002 50107 CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2007		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
	Administration	1410		130,923	130,923	130,923	130,923	Complete
	Operating Budget	1406		220,000	220,000	220,000	220,000	Complete
	Capital Needs Assessment	1408		60,000	60,000	60,000	60,000	Complete
	HOPE VI	1408		40,000	40,000	40,000	40,000	Complete
	Architect & Engineering	1430		45,000	45,000	45,000	45,000	Complete
2-1 Washington Village	Lintels & Repointing	1460		282,000	235,985	235,985	235,985	Complete
2-1 Washington Village	Sidewalks	1460		74,000	121,592	121,592	121,591	Complete
2-2 Roodner Court	Mailboxes	1460		44,000	42,500	42,500	42,500	Complete
2-3 Senior Court	Replace Fire Annunciator Panels	1460		55,000	0	0	0	
2-4 Irving Freese Apt.	Porch Roofs	1460		35,000	0	0	0	
2-5 Leroy Downs Apt	Windows	1460		125,000	82,724	82,724	82,724	Complete
2-7 20 West Avenue	Roof Replacement	1460		50,000	185,528	185,528	185,528	Complete
2-7 20 West Avenue	Rehab Learning Center	1460		36,000	25,671	25,671	25,671	Complete
2-8 King Kennedy	Remove asbestos, tile & replace in vacancies	1460		0	0	0	0	
2-16 Meadow Gardens	Remove asbestos, tile & replace in vacancies	1460		0	0	0	0	
2-17 Seaview	Exterior Finish & Caulking, Painting & Numbering	1460		69,000	69,000	69,000	69,000	Complete
2-17 Seaview	Site Lighting	1460		15,000	15,000	15,000	15,000	Complete
2-18 Fairfield Ave	Windows	1460		0	33,000	33,000	33,000	Complete
2-19 25 Chapel Street	Subfloor Replacement	1460		16,000	0	0	0	

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

**Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program**

[illegible]

² To be completed for the Performance and Evaluation Report.

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Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 4/30/2011

Part III: Implementation Schedule for Capital Fund Financing Program					Federal FFY of Grant: 2007
PHA Name: Norwalk Housing Authority					
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
2-1 Washington Village	8/31/2009		8/31/2011		
2-2 Roodner Court	8/31/2009		8/31/2011		
2-3 Senior Court	8/31/2009		8/31/2011		
2-4 Irving Freese Apt.	8/31/2009		8/31/2011		
2-5 Leroy Downs Apt	8/31/2009		8/31/2011		
2-7 20 West Avenue	8/31/2009		8/31/2011		
2-8 King Kennedy	8/31/2009		8/31/2011		
2-16 Meadow Gardens	8/31/2009		8/31/2011		
2-18 Fairfield Ave	8/31/2009		8/31/2011		
2-19 25 Chapel Street	8/31/2009		8/31/2011		
2-22 356 Main Ave.	8/31/2009		8/31/2011		

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

U.S. Department of Housing and Urban Development
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OMB No. 2577-0226
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Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary					
PHA Name: Norwalk Housing Authority		Grant Type and Number Capital Fund Program Grant No: CT 26 P002 50108 Replacement Housing Factor Grant No: Date of CFFP:			FFY of Grant: 2008 FFY of Grant Approval: 2008
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no:2) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: 9/30/2010 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³	229,860	229,860	229,860	229,860
3	1408 Management Improvements	4,000	3,770	3,770	3,770
4	1410 Administration (may not exceed 10% of line 21)	120,000	120,000	120,000	120,000
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	100,635	100,635	100,635	100,635
8	1440 Site Acquisition				
9	1450 Site Improvement	339,940	339,940	339,940	338,130
10	1460 Dwelling Structures	562,000	543,430	543,430	526,515
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

¹ To be completed for the Performance and Evaluation Report.

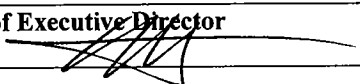
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
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Part I: Summary					
PHA Name: Norwalk Housing Authority		Grant Type and Number Capital Fund Program Grant No: CT 26 P002 50108 Replacement Housing Factor Grant No: Date of CFFP: 9/30/2010			FFY of Grant:2008 FFY of Grant Approval: 2008
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant:: (sum of lines 2 - 19)	1,337,635	1,337,635	1,337,635	1,318,910
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
Signature of Executive Director 		Date 3/16/2012		Signature of Public Housing Director 	
				Date	

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
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Part II: Supporting Pages								
PHA Name: Norwalk Housing Authority			Grant Type and Number Capital Fund Program Grant No: CT 26 P002 50108 CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2008		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
	OPERATIONS	1406		229,860	229,860	229,860	229,860	Complete
	ADMINISTRATION	1410		120,000	120,000	120,000	120,000	Complete
	HOPE VI	1408		4,000	3,770	3,770	3,770	Complete
	FEES AND COSTS	1430		100,635	100,635	100,635	100,635	Complete
2-1 Washington Village	REPOINTING	1460		0	0	0	0	
	SIDEWALKS	1450		0	0	0	0	
	Community Center	1460		28,500	28,500	28,500	28,500	Complete
2-4 Irving Freese Apt	SIDEWALKS	1450		112,200	112,200	112,200	112,200	Complete
2-5 Leroy Downs	Community Center Furniture	1460		10,000	10,000	10,000	0	On Schedule
2-6 John Shostak	SIDEWALKS	1450		59,740	59,740	59,740	58,500	On Schedule
2-8 King Kennedy	FLOORS	1460		0	0	0	0	
2-16 Meadow Gardens	FLOORS	1460		0	0	0	0	
	WALLS/EXTERIOR	1460		168,000	168,000	168,000	167,430	On Schedule
	MECHANICAL VENTILATION	1460		0	0	0	0	

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² To be completed for the Performance and Evaluation Report.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
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Part II: Supporting Pages								
PHA Name: Norwalk Housing Authority			Grant Type and Number Capital Fund Program Grant No: CT 26 P002 50108 CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2008		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
2-17 Seaview	EXTERIOR	1460		166,700	166,700	166,700	166,700	Complete
	WINDOWS	1460		0	0	0	0	
2-17 Elmwood	WINDOWS	1460		20,000	20,000	20,000	20,000	Complete
2-18 36 Fairfield Ave	EXT CHAULKING	1460		0	0	0	0	
2-18 36 Fairfield Ave	EXT PAINTING	1460		0	0	0	0	
	COUNTERTOPS	1460		0	0	0	0	
2-19 25 Chapel St.	EXTERIOR RENOVATIONS	1460		161,000	161,000	161,000	161,000	Complete
	Roofs	1460		85,000	85,000	85,000	85,000	Complete
2-22 Main Ave.	Vinyl Clad Trim	1460		30,000	30,000	30,000	30,000	Complete
	Boiler- Hot Water	1460		0	0	0	0	
	Roofs	1460		0	42,230	42,230	35,315	On Schedule

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
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Part III: Implementation Schedule for Capital Fund Financing Program					
PHA Name: Norwalk Housing Authority					Federal FFY of Grant: 2008
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
2-1 Washington Village	6/30/2010		9/30/2012		
2-4 Irving Freese Apt	6/30/2010		9/30/2012		
2-5 Leroy Downs	6/30/2010		9/30/2012		
2-6 John Shostak	6/30/2010		9/30/2012		
2-8 King Kennedy	6/30/2010		9/30/2012		
2-16 Meadow Gardens	6/30/2010		9/30/2012		
2-17 Seaview	6/30/2010		9/30/2012		
2-17 Elmwood Ave.	6/30/2010		9/30/2012		
2-18 36 Fairfield Ave	6/30/2010		9/30/2012		
2-19 25 Chapel St.	6/30/2010		9/30/2012		
2-22 Main Ave.	6/30/2010		9/30/2012		

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program
 Expires 4/30/2011

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
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Part III: Implementation Schedule for Capital Fund Financing Program					
PHA Name: Norwalk Housing Authority					Federal FFY of Grant: 2008
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
2-1 Washington Village	6/30/2010		9/30/2012		
2-3 Senior Court	6/30/2010		9/30/2012		
2-4 Irving Freese	6/30/2010		9/30/2012		
2-5 Leroy Downs	6/30/2010		9/30/2012		
2-7 20 West Ave.	6/30/2010		9/30/2012		
2-8 King Kennedy	6/30/2010		9/30/2012		
2-16 Meadow Gardens	6/30/2010		9/30/2012		
2-17 Seaview/Elmwood	6/30/2010		9/30/2012		
2-18 Fairfield Ave.	6/30/2010		9/30/2012		
2-19 25 Chapel Street	6/30/2010		9/30/2012		
2-22 356 Main Ave.	6/30/2010		9/30/2012		

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Attachment I: Annual Statements 2007-2012
Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 4/30/2011

Part I: Summary				FFY of Grant: 2009	
PHA Name: Norwalk Housing Authority		Grant Type and Number Capital Fund Program Grant No: CT26P00250109 Replacement Housing Factor Grant No: Date of CFFP: 9/30/2010			FFY of Grant Approval:
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 9/30/2010 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³	220,000	264,000	264,000	244,450
3	1408 Management Improvements	75,000	75,000	75,000	27,480
4	1410 Administration (may not exceed 10% of line 21)	120,000	132,000	132,000	120,000
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	168,502	94,087	94,087	86,574
8	1440 Site Acquisition				
9	1450 Site Improvement	209,000	148,915	148,915	125,090
10	1460 Dwelling Structures	525,000	603,500	603,500	520,657
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment	10,000	10,000	10,000	0
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

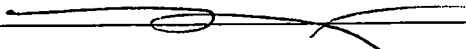
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴ RHF funds shall be included here.

Attachment I: Annual Statements 2007-2012

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
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Part I: Summary					
PHA Name: Norwalk Housing Authority		Grant Type and Number Capital Fund Program Grant No: CT26P00250109 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant: 2009 FFY of Grant Approval: 2009	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 9/30/2010 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant:: (sum of lines 2 - 19)	1,327,502	1,327,502	1,093,174	1,124,251
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
Signature of Executive Director 		Date 1/9/2012		Signature of Public Housing Director 	
				Date	

- ¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
³ PHAs with under 250 units in management may use 100% of CFF Grants for operations.
⁴ RHF funds shall be included here.

Attachment I: Annual Statements 2007-2012

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
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U.S. Department of Housing and Urban Development
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Part II: Supporting Pages								
PHA Name: Norwalk Housing Authority			Grant Type and Number Capital Fund Program Grant No: CT26P00250109 CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2009		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
	Administration	1410		120,000	132,000	132,000	120,000	On Schedule
	Operating Budget	1406		220,000	264,000	264,000	244,450	On Schedule
	Mgmt. Improvements- Marketing	1408		75,000	75,000	75,000	27,480	On Schedule
	Architect & Engineering	1430		55,000	65,206	65,206	57,693	On Schedule
	HOPE VI	1430		108,502	28,881	28,881	28,881	Complete
	Needs Assessment	1430		5,000	0			
2-3 Senior Court	Fire Alarms	1460		145,000	145,000	145,000	145,000	Complete
2-5 Leroy Downs	Community Furniture	1475		10,000	10,000	10,000		On Schedule
2-5 Leroy Downs	Fire Alarms	1460		75,000	0	0	0	
2-7 20 West Ave.	Fire Alarms	1460		125,000	125,000	125,000	125,000	Complete
2-7 20 West Ave.	Elevators	1460		10,000	10,000	10,000	0	On Schedule
2-8 King Kennedy	Driveways & Stoops	1450		139,000	140,000	140,000	119,373	On Schedule
2-8 King Kennedy	Kitchen Renovations	1460		200,000	200,000	200,000	136,156	On Schedule
2-8 King Kennedy	Sheds	1460		9,000	9,000	9,000	0	On Schedule
2-16 Meadow Gardens	Retaining Wall	1450		70,000	8,915	8,915	5,717	On Schedule
2-17 Seaview	Exterior Windows	1460		36,000	36,000	36,000	36,000	Complete
2-1 Washington Village	Intercoms	1460		0	78,500	78,500	78,500	Complete

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

**Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program**

Part II: Supporting Pages

Grant Type and Number	Amount	Source	Year
...

CFFP (Yes/ No):

Federal FFY of Grant: 2009

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

Attachment I: Annual Statements 2007-2012

**Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program**

**U.S. Department of Housing and Urban Development
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Expires 4/30/2011**

[illegible]

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Attachment I: Annual Statements 2007-2012
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Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
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Expires 4/30/2011

Part I: Summary				FFY of Grant: 2009	
PHA Name: Norwalk Housing Authority		Grant Type and Number Capital Fund Program Grant No: CT26S00250109 Replacement Housing Factor Grant No: Date of CFFP:			FFY of Grant Approval: 2009
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 9/30/2010 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)				
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	122,600	122,600	122,600	122,600
8	1440 Site Acquisition				
9	1450 Site Improvement	270,000	270,000	270,000	270,000
10	1460 Dwelling Structures	1,300,581	1,300,581	1,300,581	1,300,581
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴ RHF funds shall be included here.

Attachment I: Annual Statements 2007-2012

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
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Part I: Summary					
PHA Name: Norwalk Housing Authority		Grant Type and Number Capital Fund Program Grant No: CT26S00250109 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant: 2009 FFY of Grant Approval: 2009	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant:: (sum of lines 2 - 19)	1,693,181	1,693,181	1,693,181	1,693,181
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
Signature of Executive Director 		Date 1/9/2012		Signature of Public Housing Director Date	

¹ To be completed for the Performance and Evaluation Report.
² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.
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Attachment I: Annual Statements 2007-2012

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

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Part II: Supporting Pages								
PHA Name: Norwalk Housing Authority			Grant Type and Number Capital Fund Program Grant No: CT26S00250109 CFFP (Yes/ No): Replacement Housing Factor Grant No:			Federal FFY of Grant: 2009		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
	Architectural & Engineering Fees	1430		122,600	122,600	122,600	122,600	Complete
2-2 Roodner Court	Replace stair treads	1460		60,000	60,000	60,000	60,000	Complete
2-2 Roodner Court	Circulator pumps & mixing valves	1460		87,530	87,530	87,530	87,530	Complete
2-3 Senior Court	Bathroom renovations	1460		92,750	92,750	92,750	92,750	Complete
2-4 Irving Freese	Bathroom renovations	1460		92,750	92,750	92,750	92,750	Complete
2-4 Irving Freese	Roofs	1460		110,900	110,900	110,900	110,900	Complete
2-4 Irving Freese	Intercoms	1460		0	0	0	0	
2-5 Leroy Downs	Bathroom renovations	1460		70,000	70,000	70,000	70,000	Complete
2-6 John Shostak	Rear Doors	1460		20,000	20,000	20,000	20,000	Complete
2-8 King Kennedy	Replace fencing, sheds, exterior painting/ repainting	1450		240,000	240,000	240,000	240,000	Complete
2-16 Meadow Gardens	Replace bathrooms/ install ventilation system	1460		245,000	245,000	245,000	245,000	Complete
2-17 Seaview	Exterior siding/windows	1460		0	0	0	0	
2-17 Elmwood Ave.	Repaving	1450		30,000	30,000	30,000	30,000	Complete
2-18 Fairfield Ave.	Structural repairs	1460		0	0	0	0	
2-22 Main Ave.	Exterior renovations, roofs, storm doors, painting of siding, playground	1450		254,000	254,000	254,000	254,000	Complete
Ludlow Village	Replace roofs/ State Housing Transition to Federal	1460		60,000	60,000	60,000	60,000	Complete
Chapel St.	Exterior	1460		207,651	207,651	207,651	207,651	Complete

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

**Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 4/30/2011

[illegible]

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² To be completed for the Performance and Evaluation Report.

Attachment I: Annual Statements 2007-2012

Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

Office of Public and Indian Housing
OMB No. 2577-0226
Expires 4/30/2011

Part III: Implementation Schedule for Capital Fund Financing Program					Federal FFY of Grant: 2009
PHA Name: Norwalk Housing Authority					
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
2-2 Roodner Court	3/17/2010		3/17/2012	12/31/2011	
2-3 Senior Court	3/17/2010		3/17/2012	12/31/2011	
2-4 Irving Freese	3/17/2010		3/17/2012	12/31/2011	
2-5 Leroy Downs	3/17/2010		3/17/2012	12/31/2011	
2-6 John Shostak	3/17/2010		3/17/2012	12/31/2011	
2-8 King Kennedy	3/17/2010		3/17/2012	12/31/2011	
2-16 Meadow Gardens	3/17/2010		3/17/2012	12/31/2011	
2-17 Seaview	3/17/2010		3/17/2012	12/31/2011	
2-18 36 Fairfield Ave.	3/17/2010		3/17/2012	12/31/2011	
2-22 Main Ave.	3/17/2010		3/17/2012	12/31/2011	
Ludlow Village	3/17/2010		3/17/2012	12/31/2011	

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 4/30/2011

[illegible]

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Attachment I: Annual Statements 2007-2012

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 4/30/2011

Part I: Summary					
PHA Name: Norwalk Housing Authority		Grant Type and Number Capital Fund Program Grant No: CT00200000309R Replacement Housing Factor Grant No: Date of CFFP:			FFY of Grant: 2009 FFY of Grant Approval: 2009
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 9/30/2010 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)	25,000	49,110	49,110	4,438
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures	717,763	693,683	693,683	492,907
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

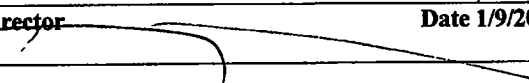
³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴ RHF funds shall be included here.

Attachment I: Annual Statements 2007-2012

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 4/30/2011

Part I: Summary					
PHA Name: Norwalk Housing Authority		Grant Type and Number Capital Fund Program Grant No: CT00200000309R Replacement Housing Factor Grant No: Date of CFFP:			FFY of Grant: 2009 FFY of Grant Approval:
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 9/30/2010 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant:: (sum of lines 2 - 19)	742,763	742,763	742,763	
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures	742,763	742,763	742,763	
Signature of Executive Director 		Date 1/9/2012		Signature of Public Housing Director _____ Date _____	

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

**U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 4/30/2011**

[illegible]

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² To be completed for the Performance and Evaluation Report.

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

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² To be completed for the Performance and Evaluation Report.

**Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program**

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Attachment I

**U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 4/30/2011**

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Attachment I: Annual Statements 2007-2012

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 4/30/2011

Part I: Summary					
PHA Name: Norwalk Housing Authority		Grant Type and Number Capital Fund Program Grant No: CT 00200000509R Replacement Housing Factor Grant No: Date of CFFP:			FFY of Grant: 2009 FFY of Grant Approval: 2009
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 9/30/2010 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³				
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)	15,793	15,793	15,793	7,857
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs				
8	1440 Site Acquisition				
9	1450 Site Improvement				
10	1460 Dwelling Structures	1,289,737	1,289,737	1,289,737	833,460
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

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⁴ RHF funds shall be included here.

Attachment I: Annual Statements 2007-2012

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
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Expires 4/30/2011

Part I: Summary					
PHA Name: Norwalk Housing Authority		Grant Type and Number Capital Fund Program Grant No: CT 00200000509R Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant: 2009 FFY of Grant Approval: 2009	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 9/30/2010 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended.
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant:: (sum of lines 2 - 19)	1,314,737	1,314,737	1,314,737	833,460
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures	1,314,737			
Signature of Executive Director _____		Date 1/9/2012		Signature of Public Housing Director _____ Date _____	

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

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**Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program**

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
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[illegible]

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**Annual Statement/Performance and Evaluation Report
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[illegible]

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**Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program**

[illegible]

Attachment I

Capital Fund Financing Program

Expires 4/30/2011

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Attachment I: Annual Statements 2007-2012

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
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Expires 4/30/2011

Part I: Summary					
PHA Name: Norwalk Housing Authority		Grant Type and Number Capital Fund Program Grant No: CT26P00250110 Replacement Housing Factor Grant No: Date of CFFP:			FFY of Grant: 2010 FFY of Grant Approval: 2010
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no:2) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: 9/30/2010 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³	220,000	260,000	260,000	142,102
3	1408 Management Improvements	115,000	115,000	71,520	66,920
4	1410 Administration (may not exceed 10% of line 21)	120,000	132,000	132,000	120,000
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	85,000	94,353	94,353	85,000
8	1440 Site Acquisition				
9	1450 Site Improvement	616,311	518,330	308,330	355,086
10	1460 Dwelling Structures	168,500	205,628	205,628	168,500
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment				
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.


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⁴ RHF funds shall be included here.

Attachment I: Annual Statements 2007-2012

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 4/30/2011

Part I: Summary					
PHA Name: Norwalk Housing Authority		Grant Type and Number Capital Fund Program Grant No: CT26P00250110 Replacement Housing Factor Grant No: Date of CFFP:		FFY of Grant:2010 FFY of Grant Approval: 2010	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input checked="" type="checkbox"/> Performance and Evaluation Report for Period Ending: 9/30/2010 <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant:: (sum of lines 2 - 19)	1,325,811	1,325,311	1,071,831	937,608
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security - Soft Costs				
24	Amount of line 20 Related to Security - Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				
Signature of Executive Director 		Date 3/16/2012		Signature of Public Housing Director 	
				Date	

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Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

[illegible]

² To be completed for the Performance and Evaluation Report.

**Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program**

[illegible]

² To be completed for the Performance and Evaluation Report.

**Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program**

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Attachment I

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

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Attachment I

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 OMB No. 2577-0226
 Expires 4/30/2011

Part I: Summary					
PHA Name: NORWALK HOUSING AUTHORITY		Grant Type and Number Capital Fund Program Grant No: CT26P00250111 Replacement Housing Factor Grant No: Date of CFFP: _____			FFY of Grant: 2011 FFY of Grant Approval: 2011
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no:2) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³	160,000	230,000	230,000	0
3	1408 Management Improvements	10,000	10,000	0	0
4	1410 Administration (may not exceed 10% of line 21)	118,075	118,075	118,075	0
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	80,000	60,000	0	0
8	1440 Site Acquisition				
9	1450 Site Improvement	335,000	260,000	0	
10	1460 Dwelling Structures	455,780	467,682	98,971	17,795
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment	25,000	35,000	28,779	
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2 – 19)	1,180,757	1,180,757	475,825	17,795
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security – Soft Costs				
24	Amount of line 20 Related to Security – Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

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⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
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Part I: Summary					
PHA Name: NORWALK HOUSING AUTHORITY		Grant Type and Number Capital Fund Program Grant No: CT26P00250111 Replacement Housing Factor Grant No: Date of CFFP: _____		FFY of Grant: 2011 FFY of Grant Approval: 2011	
Type of Grant <input type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input checked="" type="checkbox"/> Revised Annual Statement (revision no:2) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
Signature of Executive Director		Date 3/16/2012		Signature of Public Housing Director Date	

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Part II: Supporting Pages								
PHA Name: NORWALK HOUSING AUTHORITY		Grant Type and Number Capital Fund Program Grant No: CT26P00250111 CFFP (Yes/ No): Replacement Housing Factor Grant No:				Federal FFY of Grant: 2011		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
2-3 Senior Ct.	Replace sidewalks/parking lot/pads	1450	2 Bldgs.	170,000	150,000	0	0	On Schedule
	Community Center Furnishing	1475	1 room	25,000	0	0	0	
2-4 Irving Frees	Community Center Furnishing	1475	1 room	25,000	0	0	0	
2-5 Leroy Down	Elevator Renovations	1460	1 cab	135,780	123,711	0	0	On Schedule
2-8 King Kenn.	Exterior renovations-siding,etc	1460	5 Bldgs.	255,000	245,000	0	0	On Schedule
2-16 Meadow Gard	Replace baseboard radiation	1460	4 Bldgs.	52,000	0	0	0	
	Kitchens & Baths	1460		0	98,971	98,971	17,795	On Schedule
2-17 Elmwood	Kitchen/Bath upgrades	1460	4 units	25,000	0	0	0	
2-22 Main Ave.	Replace parking lot/fencing	1450	3 Bldgs.	120,000	110,000	0	0	On Schedule
2-8 Ludlow Vill.	Community Center Furnishing	1475	1 room	25,000	0	0	0	
2-2 Roodner Court	Truck	1475		0	35,000	28,879	0	On Schedule
PHA WIDE (office	Main Office- Elevator upgrade	1460	1 Bldg.	65,000	0	0	0	
PHA WIDE	Landscaping Improvements	1450		45,000	0	0	0	

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² To be completed for the Performance and Evaluation Report.

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 4/30/2011

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² To be completed for the Performance and Evaluation Report.

Part III: Implementation Schedule for Capital Fund Financing Program					
PHA Name: NORWALK HOUSING AUTHORITY				Federal FFY of Grant: 2011	
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
CT 2-3 Senior Court	7/30/2013		7/30/2015		
CT 2-4 Irving Freese	7/30/2013		7/30/2015		
CT 2-5 Leroy Downs	7/30/2013		7/30/2015		
CT 2-8 King Kennedy	7/30/2013		7/30/2015		
CT 2-16 Meadow Gardens	7/30/2013		7/30/2015		
CT 2-17 Elmwood	7/30/2013		7/30/2015		
CT 2-22 Main Ave.	7/30/2013		7/30/2015		
CT 2-8 Ludlow Village	7/30/2013		7/30/2015		

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

PHA Name: NORWALK HOUSING AUTHORITY

Reasons for Revised Target Dates ¹	
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100	100

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Annual Statement/Performance and Evaluation Report
Capital Fund Program, Capital Fund Program Replacement Housing Factor and
Capital Fund Financing Program

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 4/30/2011

Part I: Summary		Grant Type and Number		FFY of Grant:	
PHA Name:		Capital Fund Program Grant No: CT26P00250112		2012	
NORWALK HOUSING AUTHORITY		Replacement Housing Factor Grant No:		FFY of Grant Approval:	
		Date of CFFP:		2012	
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
1	Total non-CFP Funds				
2	1406 Operations (may not exceed 20% of line 21) ³	\$166,982.00			
3	1408 Management Improvements				
4	1410 Administration (may not exceed 10% of line 21)	\$118,075.00			
5	1411 Audit				
6	1415 Liquidated Damages				
7	1430 Fees and Costs	\$80,000.00			
8	1440 Site Acquisition				
9	1450 Site Improvement	\$195,000.00			
10	1460 Dwelling Structures	\$575,700.00			
11	1465.1 Dwelling Equipment—Nonexpendable				
12	1470 Non-dwelling Structures				
13	1475 Non-dwelling Equipment	\$45,000.00			
14	1485 Demolition				
15	1492 Moving to Work Demonstration				
16	1495.1 Relocation Costs				
17	1499 Development Activities ⁴				
18a	1501 Collateralization or Debt Service paid by the PHA				
18ba	9000 Collateralization or Debt Service paid Via System of Direct Payment				
19	1502 Contingency (may not exceed 8% of line 20)				
20	Amount of Annual Grant: (sum of lines 2 – 19)	\$1,180,757.00			
21	Amount of line 20 Related to LBP Activities				
22	Amount of line 20 Related to Section 504 Activities				
23	Amount of line 20 Related to Security – Soft Costs				
24	Amount of line 20 Related to Security – Hard Costs				
25	Amount of line 20 Related to Energy Conservation Measures				

¹ To be completed for the Performance and Evaluation Report.

² To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

³ PHAs with under 250 units in management may use 100% of CFP Grants for operations.

⁴ RHF funds shall be included here.

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Part I: Summary					
PHA Name: NORWALK HOUSING AUTHORITY		Grant Type and Number Capital Fund Program Grant No: CT26P00250112 Replacement Housing Factor Grant No: Date of CFFP: _____		FFY of Grant: 2012 FFY of Grant Approval: 2012	
Type of Grant <input checked="" type="checkbox"/> Original Annual Statement <input type="checkbox"/> Reserve for Disasters/Emergencies <input type="checkbox"/> Revised Annual Statement (revision no:) <input type="checkbox"/> Performance and Evaluation Report for Period Ending: <input type="checkbox"/> Final Performance and Evaluation Report					
Line	Summary by Development Account	Total Estimated Cost		Total Actual Cost ¹	
		Original	Revised ²	Obligated	Expended
Signature of Executive Director _____		Date 1/9/2012		Signature of Public Housing Director _____ Date	

Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Part II: Supporting Pages								
PHA Name: NORWALK HOUSING AUTHORITY		Grant Type and Number Capital Fund Program Grant No: CT26P00250112 CFFP (Yes/ No): Replacement Housing Factor Grant No:				Federal FFY of Grant: 2012		
Development Number Name/PHA-Wide Activities	General Description of Major Work Categories	Development Account No.	Quantity	Total Estimated Cost		Total Actual Cost		Status of Work
				Original	Revised ¹	Funds Obligated ²	Funds Expended ²	
CT 2-3 Senior Ct.	Community Center Furnishing	1475	1 room.	\$25,000				
CT 2-16 Meadow G	Replace kitchens and sewer lines	1460	4 Bldgs.	\$575,700				
CT 2-16 Meadow G	Replace parking lot	1450	4 Bldgs.	\$195,000				
Ludlow Village	Community Center Furnishing	1475	1 room	\$20,000				
PHA WIDE	Architect/Engineering Fees	1430		\$80,000				
PHA WIDE	Administration	1410		\$118,075				
PHA WIDE	Operations	1406		\$166,982				

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

² To be completed for the Performance and Evaluation Report.

**U.S. Department of Housing and Urban Development
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Expires 4/30/2011**

¹ To be completed for the Performance and Evaluation Report or a Revised Annual Statement.

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Annual Statement/Performance and Evaluation Report
 Capital Fund Program, Capital Fund Program Replacement Housing Factor and
 Capital Fund Financing Program

U.S. Department of Housing and Urban Development
 Office of Public and Indian Housing
 Expires 4/30/2011

Part III: Implementation Schedule for Capital Fund Financing Program					
PHA Name: NORWALK HOUSING AUTHORITY					Federal FFY of Grant: 2012
Development Number Name/PHA-Wide Activities	All Fund Obligated (Quarter Ending Date)		All Funds Expended (Quarter Ending Date)		Reasons for Revised Target Dates ¹
	Original Obligation End Date	Actual Obligation End Date	Original Expenditure End Date	Actual Expenditure End Date	
CT 2-3 Senior Court	7/30/2014		7/30/2016		
CT 2-16 Meadow Garden	7/30/2014		7/30/2016		
Ludlow Village	7/30/2014		7/30/2016		
PHA Wide	7/30/2014		7/30/2016		

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

**U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 4/30/2011**

¹ Obligation and expenditure end dated can only be revised with HUD approval pursuant to Section 9j of the U.S. Housing Act of 1937, as amended.

Attachment J: Capital Fund Program—Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 4/30/20011

Part I: Summary						
PHA Name/Number Norwalk Housing Authority			Locality (City/County & State) Norwalk, CT.		<input checked="" type="checkbox"/> Original 5-Year Plan <input type="checkbox"/> Revision No:	
A.	Development Number and Name	Work Statement for Year 1 FFY 2012	Work Statement for Year 2 FFY 2013	Work Statement for Year 3 FFY 2014	Work Statement for Year 4 FFY 2015	Work Statement for Year 5 FFY 2016
B.	Physical Improvements Subtotal	Annual Statement	\$902,594	\$902,594	\$847,780	\$877,682
C.	Management Improvements					
D.	PHA-Wide Non-dwelling Structures and Equipment					
E.	Administration		\$118,075	\$118,075	\$118,075	\$118,075
F.	Other					
G.	Operations		\$160,088	\$160,088	\$214,902	\$185,000
H.	Demolition					
I.	Development					
J.	Capital Fund Financing – Debt Service					
K.	Total CFP Funds		\$1,180,757	\$1,180,757	\$1,180,757	\$1,180,757
L.	Total Non-CFP Funds					
M.	Grand Total		\$1,180,757	\$1,180,757	\$1,180,757	\$1,180,757

Part I: Summary (Continuation)

PHA Name/Number Norwalk Housing Authority			Locality (City/county & State) Norwalk, CT.		<input checked="" type="checkbox"/> Original 5-Year Plan	<input type="checkbox"/> Revision No:
A.	Development Number and Name	Work Statement for Year 1 FFY 2012	Work Statement for Year 2 FFY 2013	Work Statement for Year 3 FFY 2014	Work Statement for Year 4 FFY 2015	Work Statement for Year 5 FFY 2016
2-1	Washington Village	Annual Statement				
2-2	Roodner Court			\$650,000		\$330,122
2-3	Senior Court					
2-4	Irving Freese					
2-5	Leroy Downs		\$215,000			
2-6	John Shostak		\$200,000			
2-7	20 West Avenue		\$275,000			\$62,966
2-8	King Kennedy					
2-16	Meadow Gardens		\$105,000		\$288,780	
2-17	Elmwood Avenue				\$30,000	
2-18	Fairfield Avenue			\$105,000	\$395,000	
2-19	Chapel Street					\$399,594
2-22	Main Avenue					
	PHA WIDE- Site Imp.		\$17,594			
	PHA WIDE-computers/software			\$42,594	\$34,000	
	PHA WIDE A&E		\$90,000	\$105,000	\$100,000	\$85,000

Part II: Supporting Pages – Physical Needs Work Statement(s)						
Work Statement for Year 1 FFY 2012	Work Statement for Year 2 FFY 2013			Work Statement for Year: 3 FFY 2014		
	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost	Development Number/Name General Description of Major Work Categories	Quantity	Estimated Cost
See	CT 2-7 20 West Ave. Exterior renovations-parking lot/ramps/fencing/lighting/ retaining wall	1building	\$275,000	CT 2-2 Roodner Court Replacement of windows	13 buildings	\$650,000
Annual	CT 2-5 Leroy Downs Replace kitchens	1 buildings/49units	\$215,000	CT 2-18 Fairfield Avenue structural repairs of Buildings	2 buildings/29units	\$105,000
Statement	CT 2-6 John Shostak Replace kitchens	4 buildings 40 units	\$200,000			
	CT 2-16 Meadow Gardens Replacement of fin –tube radiators and covers	4 buildings 54 units	\$105,000			
				PHA WIDE Computer system upgrade/software	PHA Wide	\$42,594
	PHA Wide Site Improvements	PHA Wide	\$17,594			
	Subtotal of Estimated Cost		\$ 812,594	Subtotal of Estimated Cost		\$797,594

**U.S. Department of Housing and Urban Development
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[illegible]

Part III: Supporting Pages – Management Needs Work Statement(s)				
Work Statement for Year 1 FFY 2012	Work Statement for Year 2 FFY 2013		Work Statement for Year: 3 FFY 2014	
	Development Number/Name General Description of Major Work Categories	Estimated Cost	Development Number/Name General Description of Major Work Categories	Estimated Cost
See				
Annual	PHA WIDE Administration	\$118,075	PHA WIDE Administration	\$118,075
Statement				
	PHA WIDE Operations	\$160,088	PHA WIDE Operations	\$160,088
	PHA WIDE Architects & Engineers	\$90,000	PHA WIDE Architects & Engineers	\$105,000
	Subtotal of Estimated Cost	\$ 368,163	Subtotal of Estimated Cost	\$383,163

**U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
Expires 4/30/20011**

[illegible]

Attachment K: Definition of Substantial Deviation and Significant Amendment Policy

HUD requires in 24 CFR 903.7(r) (2), that a PHA must set forth the basic criteria will be used for denoting a substantial deviation from its 5-Year Plan; and a significant amendment or modification to its 5-Year Plan and Annual Plan.

The NHA defines the following actions as being a **substantial deviation**

- 1. Any change to its Mission statement, or the addition or deletion of a goal.*

Note: Changes in strategies used to achieve goals are not considered a substantial deviation.

The NHA defines the following changes as being a **significant amendment or modification**

- 1. Change of an expected start date or completion date for stated goals in the 5 Year Plan resulting in a delay of more than one year.*
- 2. Changes in Operating or CFP budget line items or total budget amounts in excess of 30% of the original line item or totals.*

Other changes and progress made towards implementing the goals, objectives and strategies will be reported as part of the annual reporting process.

Substantial deviations and significant amendments that are contemplated will be executed in accordance with 24 CFR 903.21.

ATTACHMENT L1: CIVIL RIGHTS CERTIFICATION

- 10. Civil Rights Certification.** A PHA will be considered in compliance with the Civil Rights and AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction.

EXAMINATION OF PHA PROGRAMS

The NHA maintains statistics on protected classes in the following programs or parts of programs. The review of NHA files provides the following information on various programs of the NHA. The data is gathered from the NHA files. The tolerance range is an application of the deconcentration methodology of HUD, which basically calls for examination and action (if appropriate) if the percentage of the element analyzed is lower than that for the population in Norwalk by 15% or higher by 15%. As the housing authority serves households whose income is less than or equal to 80% of median, the comparison of NHA data is with that same low income population in the City as a whole.

That is, if the numbers of people affected by or using the NHA programs is more than 15% different than the population in the eligible population for housing ($\leq 80\%$ median), then the NHA will look at reasons for that. For example, in the first table below, the table indicates that whites and blacks have a disproportionate share of move-ins to family public housing. In the case of blacks, this could be due to the lower incomes of black households and the requirement that at least 40% of admissions be of extremely low income households.

In analyzing data which warrants further investigation, we are using the 85% rule. The results in the table column labeled "Within Range" indicates whether the NHA should examine these results more closely and whether some action is warranted to prevent inadvertent discrimination against a particular class.

I should be noted also, that the ACS data while more recent than the US Census in 2010, is fraught with large error rates for what we are looking at. Hence we are using the December 2009 data set developed jointly by HUD and the US Census rather than 2010 ACS estimates published in September 2011.

- 1. Who is applying for housing and who is being admitted?**
 - a. While the waiting list may not be open for significant periods of time, when it is open, the NHA maintain statistics on protected classes who are applying and compares them with the population at large in Norwalk.
 - b. When inviting applications, the NHA advertises for housing applicants in accordance its Affirmative Fair Housing Marketing Plan.
 - c. The NHA will apply for housing resources when opportunities exist. These resources are rarely made available, but the NHA monitors NOFAs and responds to them accordingly. For example, in response to a 2010 HUD Notice of Funding availability the NHA applied for 85 vouchers for people with disabilities but was not funded.

Family Public Housing Application Analysis 4/1/10-3/31/11

	PROTECTED CLASS	CURRENT RESIDENT	CURRENT RESIDENT	APPLICATIONS	APPLICATIONS	MOVE-INS	MOVE-INS	CITY % 12/2009 HUD/ACS CENSUS <=80% MEDIAN	TOLERANCE RANGE	CURRENT RESIDENTS WITHIN RANGE
RACE		#	%	#	%	#	%	%		
	WHITE	344	42	185	46	32	34	53.52	45.49- 61.55	NO
	BLACK	444	58	192	47	62	65	16.58	14.09- 19.07	NO
	ASIAN/ P. ISLANDER	2	.37	0	0	1	1	3.49	2.97- 4.01	NO
	OTHER	1	.12	24	7	0	0	1.11	.94- 1.28	N/A
ETHNICITY										
	HISPANIC	279	34	142	35	31	33	21.5	18.28- 24.73	NO
SEX										
	Male	114	14	91	23	10	11	49	41.65- 56.35	NO
	Female	701	86	310	77	85	89	51	43.35- 58.65	NO
FAMILY STATUS										
	With Children Under 18	521	64	231	58	74	77	64	54.4- 73.6	YES
	Disabled Member in Family	127	16	37	9	6		10	8.5- 11.5	NO

* Other Includes: American Indian, Pacific Islander, Mixed Race and Other Race.

** Hispanic is an ethnic descriptor and is a sort of all races by Hispanic/Latino origins.

Senior Public Housing Application Analysis 4/1/10-3/31/11

	PROTECTED CLASS	CURRENT RESIDENT	CURRENT RESIDENT	APPLICATIONS	APPLICATIONS	MOVE-INS	MOVE-INS	CITY % 12/2009 HUD/ACS CENSUS <=80% MEDIAN	TOLERANCE RANGE	CURRENT RESIDENTS WITHIN RANGE
RACE		#	%	#	%	#	%	%		
	WHITE	151	52	53	65		60	53.52	45.49-61.55	YES
	BLACK	137	47	24	30		38	16.58	14.09-19.07	NO
	ASIAN/ P. ISLANDER	3	1	4	5		2	3.49	2.96-4.01	NO
	OTHER	0	0	0	0			1.11	NOT SIGNIFICANT	N/A
ETHNICITY										
	HISPANIC	65	22	30			19	25.30	18.28-24.73	YES
SEX										
	Male	118	41		51		33	49	41.65-56.35	NO
	Female	173	59		49		33	51	43.35-58.65	NO
DISABLED		83	29		9		21	10	8.5-11.5	NO

Housing Choice Voucher Participant Analysis 4/1/2010-3/31/2011

	PROTECTED CLASS	CURRENT PARTICIPANT	CURRENT PARTICIPANT	APPLICATIONS	APPLICATIONS	MOVE-INS	MOVE-INS	CITY % 12/2009 HUD/ACS CENSUS <=80% MEDIAN	TOLERANCE RANGE	CURRENT RESIDENTS WITHIN RANGE
RACE		#	%	#	%	#	%	%		
	WHITE	370	44	224	53.5	13	28	53.52	45.49-61.55	NO
	BLACK	468	55	194	46	32	70	16.58	14.09-19.07	NO
	ASIAN/ P. ISLANDER	3	<1	2	<.5	0	0	3.49	2.96-4.01	NO
	OTHER	2	<1	0	0	1	2	1.11	NOT SIGNIFICANT	N/A
ETHNICITY										
	HISPANIC	192	23	107	26	11	26	25.30	18.28-24.73	YES
SEX										
	Male	129	15	149	36	7	15	49	41.65--56.35	NO
	Female	712	85	270	64	39	85	51	43.35-58.65	NO
FAMILY STATUS										
	With Children Under 18	434	51	117	28	35	76	64	54.4-73.6	NO
	Disabled Member in Family	254	30	279	67	3	6	10	8.5-11.5	NO

This is the first year NHA has analyzed program participation in the above charts. We will compare future years to identify trends that may indicate the need for additional outreach.

HCV rules require that 70% of new admissions to the program be extremely low income [ELI] (<=30% Area Median Income). This favors the admission of protected classes which have a disproportionate share of the ELI population.

2. **Who is being selected for housing?**

- a. While the selection process is governed by government rules, there is some flexibility available to the NHA to intervene to address impediments to fair housing.
 - i. The NHA has established a two-tier HCV payment system to enable voucher participants to access housing in higher income census tracts. It monitors the results of this annually. From April 1, 2010 to August 31, 2011, the strategy has resulted in the following:
 - a. 52 families moved to upper tier (income) census tracts:
 - FSS participants 22%

- Disabled 9%
 - Non elderly 98 %
 - White 48%
 - Black 52%
 - Ethnicity break down – Hispanic 28%. Non-Hispanic 72%
 - Average age of participant 47 yrs.
- b. 15 families moved to lower tier (income) census tracts:
1. FSS participants 9 %
 2. Disabled 20%
 3. Non elderly 89%
 4. White 35%
 5. Black 65%
 6. Ethnicity break down – Hispanic 21%. Non-Hispanic 79%
 7. Average age of participant 49 yrs.

Since 2007, the overall outcomes of this policy have been as follows:

The increase of clients living in the higher census track from 2006 before we started the program vary 2010 is 15%.

The decrease of clients living in the lower census track for the same period is 20%.

3. Who is being provided access to ancillary services?

- a. The NHA runs a number of ancillary programs designed to benefit tenants and participants in NHA housing. These are catalogued each year in terms of whom they target and the number of beneficiaries. These include the following:
 - i. Asset development of public housing and voucher participants by implementing a Family Self Sufficiency Program, which is designed to mentor public housing residents to improve their job success. The program enables families which improve their earnings to escrow their additional income 30% of which would have been used to pay additional rent. Escrow funds can be used for college or vocational school fees or for homeownership.
 - ii. Providing homeownership counseling and assistance to those seeking to become homeowners.
 - iii. Distributing capital funds for housing improvements according to objective analysis of that need and redevelopment plans, without consideration of the occupants classes but mindful of the needs of all protected classes.
 - iv. Providing Community Learning Centers and staff and volunteers all of which provide after-school programs focusing on academic improvement, summer programs and other support programs designed to close the achievement gap for public housing families.

Special Program Participant Analysis 4/1/10-3/31/11

Class	Home-ownership (Numbers)	Public Housing Family Self- Sufficiency	HCV Family Self Sufficiency	Community Learning Centers	City % 12/2009 HUD/ACS Census <=80% Median
Total Numbers	6	30	75	275	
Race:	(#)	(%)	(%)	(%)	
White	9	73%	79%	4%	53.52%
Black	13	27%	20%	56%	16.58%
Asian					3.49%
Other			1%	9%	1.11%
Ethnicity:					
Hispanic	8	53%	22%	31%	25.30%
Sex:					
Male	0	10%	5%	50%	49%
Female	22	90%	95%	50%	51%
Family Status					
With Children		90%	83%	N/A	64%
Disabled		0%	3%	Not Known	10%

Note that all these programs are engaged in voluntarily

As these programs are voluntary it is not useful to apply the 15%+/- rule used in the housing admissions programs. However, it does provide useful information to explore how the programs are working in terms of serving the populations which the agency houses.

4. The NHA also provides education for applicants, staff and landlords in its programs on Fair Housing Issues and conducts other efforts to assist people in securing housing of choice.

The listing below is divided into two groups. Group A are those activities which are more directly linked to ensuring fair housing. Group B are those activities which are indirectly linked to the efforts to ensure that NHA participants can access housing of their choice.¹

¹ HUD has issued the following guidance with respect to fair Housing: Agencies need to examine their communities in terms of the following:

- Segregated Areas and Areas of Increasing Diversity and/or Racial/Ethnic Integration
- Racially/Ethnically Concentrated Areas of Poverty

A. Direct Fair Housing Activities

1. The NHA provides information at Voucher Issuance to all participants on how to file a Fair Housing Complaint with handouts and invites the City of Norwalk's Fair Housing and Fair Rent staff to participate in briefings and training.
2. In 2007 a 2 tier Fair Market Rent payment standards was established to promote renting of units in areas of Norwalk with higher incomes, less unemployment, lower concentration of minority residents and higher homeownership rates outside of census tracts 432, 434, 437, 438, 440, 441, 442, 444 and 445. (For results see Goal 3 above). Results are monitored and where appropriate surveys may be conducted to explore findings of any problems.
3. Conducts an HCV landlord Open House to promote and explain the program in conjunction with the Fair Housing and Human Relations departments of the City of Norwalk. Sessions include training in Fair Housing regulations. The last HCV landlord Open House occurred in October 2011.
4. Provides opportunities for LRPH and HCV staff training in Fair Housing, on a regular basis. The last training occurred in May 2011.
5. Quarterly monitoring of income deconcentration by development and where necessary implements income skipping measures.
6. When available, employment opportunities are advertised in accordance with Equal Employment Opportunity
7. When necessary, opportunities to apply for housing are advertised in accordance with Affirmative Fair Housing Marketing Plan.
8. Continued to provide translators as necessary.
9. In response to 2010 HUD Notice of Funding availability applied for 100 vouchers for people with disabilities which was not funded.

B. Indirect Fair Housing Activities

1. Continue planning of affordable housing on West Cedar Street to create a mixed income community, while maintaining all 200 Section 8 project based units.
2. Choice Neighborhoods Planning Grant applied for and received from HUD to redevelop Washington Village and apply for a Choice Neighborhoods Implementation grant to deconcentrate poverty and improve housing quality. This plan includes an area south of Washington Street, east of Martin Luther King Boulevard, west of Water Street and north of Concord St.
3. Continue to implement Voucher Homeownership Program to help participants address the high cost of housing.
4. Promotes asset development of public housing and voucher participants by implementing a Family Self Sufficiency Program, which can be used for homeownership. (Since the program began in 2005 there have been 32 new homeowners created).
5. To improve public housing quality, maintain implementation schedule for capital fund program.
6. To assist as many families as possible with the high cost of housing, had 98.6% lease up rate for housing choice voucher program as of 9/1/2011. The average nationwide lease up rate is 91%.

-
- Access to Existing Areas of High Opportunity
 - Major Public Investments
 - Fair Housing Issues, Services, and Activities

7. To help HCV program participants accumulate assets for homeownership or other long term goals, operated the Housing Choice Voucher Family Self Sufficiency Program since 2005 until present.
8. To help Public Housing residents accumulate assets for homeownership other long term goals operated a Public Housing Family Self Sufficiency Program since 2006 until present.
9. To assist in these homeownership efforts and to enhance employment, a HUD ROSS grant was sought and received. This grant provides case management services through a third party.
10. To increase the earning potential and further homeownership accessibility of low income students, NHA works with the private and foundation sector to award college scholarships.

<u>Year Offered</u>	<u>Awards</u>	<u>Total Amounts</u>
2005	13	\$ 33,000
2006	20	\$ 55,500
2007	25	\$ 72,250
2008	32	\$105,100
2009	26	\$109,000
2010	32	\$124,199
2011	34	\$109,000

11. To improve educational performance and earning potential obtained Connecticut After School Grant program for reading program with certified reading teachers and Haskins Laboratory/Literacy HOW staff trainer, since 2007 and funded through 2010. A 2011 application is pending at this time (9/15/2011).
12. Also received a 2011 CDBG grant to enhance the educational efforts in item 20 above by improving the Learning Center facilities at Roodner Court.
13. Work with Norwalk Public Schools to operate Priority After School Program Grants for Fox Run, Ponus and Wolfpit Elementary schools to improve educational outcomes. Applying for Silvermine School in 2011.
14. To increase youth educational outcomes and (permitting adults to work), it has operated 5 academically oriented after school and summer centers since 2003.
15. Continue to assist seniors and the disabled at all developments by providing a resident services coordinator.

WORKS WITH THE LOCAL JURISDICTION INITIATIVES

The NHA has reviewed the draft Impediments to Fair Housing of the City of Norwalk and has identified the ways in which it has been and continues to be supportive of that AI's recommendations. **The following lists the impediments the City has identified and its recommendations and the ways in which the NHA links its programs in support.**

CITY OF NORWALK ANALYSIS OF IMPEDIMENTS NOVEMBER 2010

IMPEDIMENT ONE – DISCRIMINATION IN THE HOUSING MARKET

The review of demographic information, discrimination complaint data, and data obtained from interviews indicate that there is housing discrimination among persons in the protected classes. Statistical data can assist in identifying problems and topics of concern, however, reporting requirements among the various agencies and organizations vary, as does the quality of data provided. Further, much of the available data is at least a year old by the time it is available. The depth and types of data available at the local level should be expanded to obtain

more recent and relevant insights.

More focused, accurate and current data is necessary to understand the needs. The recommendations below address the means to obtain more current and insightful information.

In the current economy, the incidences of discrimination focus on rental housing, and the focus of efforts in the immediate future should be upon aspects of discrimination in the rental market.

In particular, discrimination among the protected classes should be the focus of the City's analysis concentrating on the top three indices of discrimination listed below:

- Race/Color
- Disability
- Lawful source of income

Recommendations

1. Educate households and housing related organizations by disseminating Fair Housing law literature, conducting Fair Housing law seminars and training, and focusing public awareness campaigns about Fair Housing law in ethnic and minority neighborhoods, and among civic, social, religious, and special interest groups. The City is active in this regard, and these efforts should be continued and even expanded, especially in the current, difficult economy.

NHA Actions Provides Fair Housing Training to staff

NHA Actions Conducts HCV (Section 8) landlord trainings in conjunction with the City of Norwalk Fair Housing Officer and Director of Human Relations.

2. Provide Fair Housing materials and educational programs in Spanish, especially in neighborhoods and communities with high percentages of Spanish-speaking persons.

NHA Actions Provides interpreters as needed

NHA Actions Refer ESL program participants to ESL programs which provide the fundamentals of the English language, including the proper pronunciation of words, proper sentence structure, and the use of tenses in both written and verbal form thus supplementing knowledge of their native language at the Adult Education Program of the Board of Education and NEON.

NHA Actions Employ staff who speaks Spanish in Public Housing, Housing Choice Voucher and Self Sufficiency areas.

3. Continue to conduct training sessions and information campaigns especially among rental property owners, and managers, as well as apartment owner associations, and management companies.

NHA Actions See NHA # 1 above

4. Monitor Fair Housing complaints and issues across the various venues and organizations through which these complaints may be made in order to obtain a better picture of issues and problems.

NHA Actions Provides information at Voucher Issuance to all participants on how to file a Fair Housing Complaint with handouts

NHA Actions Training see #1 above

5. Increase housing choice alternatives for the disabled and families with children.

NHA Actions Capital improvements in existing developments

NHA Actions Pursuit of HOPE VI or Choice Neighborhood program funding

NHA Actions Pursuit of Choice Neighborhood program

NHA Actions Pursuit of homeownership programs

NHA Actions Examination of the use of Project Based Section 8

NHA Actions Application for new vouchers when available

6. Convene focus groups of advocacy groups, community based organizations, real estate industry professionals, lenders, property owners, and government agency officials to review and assess fair housing issues. These groups should identify discriminatory practices, trends, or changes in these practices, focal points of discriminatory practice, and the means or methods to address them.

NHA Actions The NHA participates actively in various civic forums in the City and will take part in initiatives convened by the City.

7. Related to the previous recommendation, ethnic, religious, and service groups should be educated about Fair Housing issues and encouraged to serve as conduits for information, questions, and complaint procedures for their membership. This will not only broaden the knowledge of Fair Housing practice in the City, but also provide more knowledge of the number and types of issues being confronted.

NHA Actions The NHA participates actively in various civic forums in the City and will take part in initiatives convened by the City.

8. Update Fair Housing information regularly and adjust strategies and actions accordingly. In particular, the groups mentioned above should meet yearly or every eighteen months to review and update plans and programs.

NHA Actions The NHA will provide information from its agency which might be helpful to the City.

9. The City should seek the resources to expand the data collection and analysis capabilities of the local fair housing entities with the Fair Housing Officer directing this effort.

NHA Actions The NHA will provide information from its agency which might be helpful to the City.

IMPEDIMENT TWO – LIMITED SUPPLY OF AFFORDABLE HOUSING

As discussed earlier, affordability is one aspect of housing discrimination and it is difficult to talk about addressing impediments to fair housing, and actions to eliminate discrimination in housing, without simultaneously talking about development of policies, plans, programs, and projects to increase the supply of affordable housing.

Earlier sections of this Analysis and the Housing Market Analysis in the Consolidated Plan address the issue of affordability in detail, and the arguments and statistics will not be repeated here. Suffice to say that even moderate-income households face challenges in purchasing a home in Norwalk, and low-income families face a significant cost burden for rental housing.

Recommendations

1. Continue to use federal and state funding resources and programs to address high priority housing needs for rehabilitation, preservation, and homeownership creation.
NHA Actions The NHA monitors income deconcentration by development quarterly and where necessary implements income skipping measures.
NHA Actions The NHA reviews all NOFAs which might create, improve and sustain affordable housing and actively prepares proposals.
NHA Actions The NHA continues to provide homeownership preparation and financing through its FSS and Homeownership programs.
2. Continue to work with community based organizations, affordable housing developers and housing advocacy groups to leverage resources for affordable housing preservation.
NHA Actions The NHA continues to apply for vouchers as available.
NHA Actions The NHA has considered the use of Project Based Vouchers.
3. Work with the Zoning Commission to publicly review the effectiveness of the existing Inclusionary Zoning regulation.
NHA Actions The NHA has been a strong supporter of inclusionary zoning and believes that a stronger ordinance including a linkage payment program for commercial developers is critical in the expansion of affordable housing.
NHA Actions The NHA will recommend that the Workforce regulation threshold for covered projects be returned to its original 12 units from its current 20 units. It will also recommend that affordable units created by this regulation be restricted to low poverty census tracts unless part of a mixed income development.
4. Continue and, if possible, expand housing rehabilitation programs to maintain the City's base of affordable units, both owner-occupied and rental.
NHA Actions See #5 in Impediment One

IMPEDIMENT THREE – ZONING, PLANNING, AND LAND USE ISSUES

This impediment deals with issues relating to the development of land including housing that is available to a wide range of persons and income levels in disparate locations. The deconcentration of poverty is one of the key objectives of the City's Consolidated Plan, but this goal should be balanced against the objective of higher-density development with access to transportation and employment centers.

Recommendations

1. Ensure that all City master planning works to provide appropriate housing density, mixed income integration, and is available to protected classes.

NHA Actions The NHA has been pursuing the utilization of HOPE VI, Choice Neighborhoods and mixed financing resources and programs as a means to create mixed income and mixed use developments including conversion of existing NHA developments. It has received a Choice Neighborhoods Planning Grant from HUD to do the necessary planning to accomplish a mixed income neighborhood in the Washington Village area and to prepare an application for a Choice Neighborhood grant to implement the resultant plan.

2. Ensure that reasonable accommodation and disabled access issues are properly addressed.

NHA Actions The NHA has made special efforts to enable the disabled to access housing including securing new vouchers, providing preferences for the disabled and ensuring that its policies and procedures are supportive of the disabled. While 10% of the City's population of residents with income less than 80% of the area median income. The percentage of the population served I Family Public Housing is 16%, Senior Public Housing is 29% and Housing Choice Voucher is 30%.

3. Encourage the use of "visitability" and universal design principles, which exceed Federal and State accessibility requirements, in new housing construction.

NHA Actions The NHA will incorporate these in all its new development programs.

IMPEDIMENT FOUR – LOCAL OPPOSITION (NIMBY)

The proposed development or location of affordable housing, group homes, public housing, or Section 8 housing often draws storms of criticism and opposition from neighborhood residents. Norwalk is not immune from this common public reaction. The City must however work to temper the impact that such reactions have on the availability of housing for people in the protected classes and how it impacts the City's responsibility to achieve its documented fair housing objectives. While it is difficult to avoid this attitude, the City can take some measures to mitigate these challenges.

Recommendations

1. Encourage developers, housing advocacy groups, and other interested parties to conduct neighborhood outreach and information campaigns before submitting projects for review and approval.

NHA Actions This is required by HUD for development programs undertaken by the NHA.

2. Undertake a public outreach/education program.

NHA Actions As noted in prior sections, the NHA conducts a number of training programs for its staff, its clients and its cooperating landlords.

IMPEDIMENT FIVE - LENDING PRACTICES

This Analysis found that some minority groups did have higher rates of loan denial and loan withdrawal than other groups. The issue does not appear to have generated specific complaints. However, the City should, to the extent possible, ensure that persons seeking loans for home purchase or improvement are aware of lending practices and procedures.

Recommendations

1. Develop programs to foster conventional lending and banking services in underserved neighborhoods and to specific groups of persons.

NHA Actions The NHA has fostered relationships with lenders McCue Mortgage & Citibank and assists clients through the lending process for home purchasing.

2. Work with nonprofits to expand financial literacy and credit counseling programs, especially in minority and lower-income neighborhoods.

NHA Actions The NHA conducts programs for its clients which includes financial training and credit repair.

3. The significant discrepancy between lending to Hispanic homebuyers and other homebuyers is not explained by the data. This discrepancy should be examined further to understand the difference.

NHA Actions The NHA will provide information on its homeownership program with respect to this issue.

4. Assist residents who suspect lending discrimination in bringing complaints to the Connecticut Department of Banking and Attorney General's office for review and enforcement.

NHA Actions The NHA provides information to its clients of how and where to file discrimination complaints.

CONSISTENCY WITH THE CITY OF NORWALK CONSOLIDATED PLAN

The PHA Plan is prepared in advance of the Consolidated Plan, which is on a later schedule. However, the City of Norwalk participates in the preparation of the PHA Plan and provides input with respect to what the NHA can do to work with the City. Conversely, City participation, provides opportunities for the NHA to request actions by the City and support for NHA programs. We reviewed the current Consolidated Plan of the City of Norwalk and believe the goals between the two are consistent.

Copies of the PHA Plan drafts were provided the City for comment during the 45 day comment period and the final PHA Plan approved by the NHA Board of Commissioners was also submitted to and approved by the Norwalk City Council as being consistent with the City's Consolidated Plan.

Attachment L2 CERTIFICATIONS

Attached Separately

Form HUD-50077-CR, Civil Rights Certifications

Form HUD-50077: PHA Certifications of Compliance with PHA Plans and Related Regulations

Form HUD-50070: Certification for a Drug-Free Workplace

Form SF-LLL: Disclosure of Lobbying Activities
Disclosure of Lobbying Activities Continuation Sheet.

Form HUD-50071: Certification of Payments to Influence Federal Transactions

Form HUD-50077-SL, Certification by State or Local Office of PHA Consistency with the Consolidated Plan

Attachment M: VIOLENCE AGAINST WOMEN ACT POLICY

PROHIBITION AGAINST DENIAL OF ASSISTANCE TO VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, AND STALKING

The Violence against Women Act of 2005 (VAWA) and the HUD regulations at 24 CFR 5.2005 (b) prohibits PHA's from denying an applicant admission to the Public Housing Program on the basis that the applicant/tenant is or has been a victim of domestic violence, dating violence, or stalking.

Specifically, Section 607 of VAWA amends the Public Housing Program to state:

that an individual's status as a victim of domestic violence, dating violence, or stalking is not an appropriate basis for denial of program assistance by a public housing authority. It also states that incidents of domestic violence, dating violence and stalking shall not be good cause for terminating a lease held by the victim. The amendments specify that the authority of a PHA to evict or terminate perpetrators of abuse shall not be limited and gives the PHA the ability to bifurcate a lease to maintain the victim's tenancy while evicting the perpetrator. Victims must certify their status as victims by presenting appropriate documentation to the PHA, and the language clarifies that victims can be evicted for lease violations or if their tenancy poses a threat to the community.

Definitions

As used in VAWA:

- The term domestic violence includes felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.
- The term *dating violence* means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - The length of the relationship
 - The type of relationship
 - The frequency of interaction between the persons involved in the relationship
- The term *stalking* means:
 - To follow, pursue, or repeatedly commit acts with the intent to kill, injure, harass, or intimidate; or
 - To place under surveillance with the intent to kill, injure, harass, or intimidate another person; and
 - In the course of, or as a result of, such following, pursuit, surveillance, or repeatedly committed acts, to place a person in reasonable fear of the death of, or serious bodily

injury to, or to cause substantial emotional harm to (1) that person, (2) a member of the immediate family of that person, or (3) the spouse or intimate partner of that person.

- The term *immediate family member* means, with respect to a person:
 - A spouse, parent, brother or sister, or child of that person, or an individual to whom that person stands in the position or place of a parent; or
 - Any other person living in the household of that person and related to that person by blood and marriage.

NOTIFICATION TO TENANTS

VAWA requires the PHA to notify public housing program tenants of their rights under this law, including their right to confidentiality and the limits thereof.

PHA Policy

NHA will provide all tenants with notification of their protections and rights under VAWA at the time of admission and at annual reexamination.

The notice will explain the protections afforded under the law, inform the tenant of NHA confidentiality requirements, and provide contact information for local victim advocacy groups or service providers.

NHA will also include in all assistance termination notices a statement explaining assistance termination protection provided by VAWA.

NOTIFICATION TO APPLICANTS

PHA Policy

NHA will provide all applicants with notification of their protections and rights under VAWA at the time they request an application for housing assistance.

The notice will explain the protections afforded under the law, inform each applicant of NHA confidentiality requirements, and provide contact information for local victim advocacy groups or service providers.

NHA will also include in all notices of denial a statement explaining the protection against denial provided by VAWA.

RESTRICTIONS FOR THE PHA

VAWA prohibits the PHA from considering any incidents of or criminal activity related to domestic violence, dating violence, or stalking *as a cause for terminating the tenancy, occupancy, or program assistance of the victim.*

Specifically, this means that a PHA **may not** construe such violence or stalking:

1. as a serious or repeated violation of the lease by the victim
2. as other good cause for terminating the tenancy or occupancy rights of the victim
3. as criminal activity justifying the termination of the tenancy, occupancy rights, or program assistance of the victim.

However, VAWA also establishes a new way for public housing PHAs to deal with household members who engage in “criminal acts of physical violence against family members or others”:

it gives them the authority to bifurcate a lease, or divide it into two parts, if permitted by state law.

Notification and Victim Documentation

PHA Policy

APPLICANTS: NHA acknowledges that a victim of domestic violence, dating violence, or stalking may have an unfavorable history that would warrant denial under NHA's policies. Therefore, if NHA makes a determination to deny admission to an applicant family, NHA will include in its notice of denial a statement of the protection against denial provided by VAWA and will offer the applicant the opportunity to provide documentation affirming that the cause of the unfavorable history is that a member of the applicant family is or has been a victim of domestic violence, dating violence, or stalking.

TENANTS: When a family is facing assistance termination because of the actions of a tenant, household member, guest, or other person under the tenant's control and a tenant or immediate family member of the tenant's family claims that she or he is the victim of such actions and that the actions are related to domestic violence, dating violence, or stalking, NHA will require the individual to submit documentation affirming that claim.

The documentation must include two elements:

1. A signed statement (HUD Form 50066) by the victim that provides the name of the perpetrator and certifies that the incidents in question are bona fide incidents of actual or threatened domestic violence, dating violence, or stalking, and
2. One of the following:
 - a. A police or court record documenting the actual or threatened abuse, or
 - b. A statement signed by an employee, agent, or volunteer of a victim service provider; an attorney; a medical professional; or another knowledgeable professional from whom the victim has sought assistance in addressing the actual or threatened abuse. The professional must attest under penalty of perjury that the incidents in question are bona fide incidents of abuse, and the victim must sign or attest to the statement.
3. (PHIL, not sure if this is still relevant with the final rule, was unable to confirm)

The required certification and supporting documentation must be submitted to NHA within 14 business days after NHA issues a written notice to deny admission or terminate assistance. The applicant/tenant must submit the required documentation with her or his request for an informal review or must request an extension in writing at that time. If the applicant/tenant so requests, NHA will grant an extension of 10 business days, and will

postpone scheduling the informal review until after it has received the documentation or the extension period has elapsed.

If after reviewing the documentation provided by the **applicant**, NHA determines the family is eligible for assistance, no informal review will be scheduled and NHA will proceed with admission of the applicant family.

If the **tenant** does not provide the required certification and supporting documentation within 14 business days, or the approved extension period, NHA may proceed with assistance termination.

If NHA can demonstrate an actual and imminent threat to other participants or those employed at or providing service to the property if the participant's tenancy is not terminated, NHA will bypass the standard process and proceed with the immediate termination of the family's assistance.

Perpetrator Documentation

PHA Policy

In cases where an applicant family includes the perpetrator as well as the victim of domestic violence, dating violence, or stalking, NHA will proceed as above but will require, in addition, either

(a) that the perpetrator be removed from the applicant household and not reside in the assisted housing unit or

(b) that the family provide documentation that the perpetrator has successfully completed, or is successfully undergoing, rehabilitation or treatment.

If the family elects the second option, the documentation must be signed by an employee or agent of a domestic violence service provider or by a medical or other knowledgeable professional from whom the perpetrator has sought or is receiving assistance in addressing the abuse.

The signer must attest under penalty of perjury to his or her belief that the rehabilitation was successfully completed or is progressing successfully. The victim and perpetrator must also sign or attest to the documentation. This additional documentation must be submitted within the same timeframe as the documentation required above from the victim.

PHA Confidentiality Requirements

All information provided to the PHA regarding domestic violence, dating violence, or stalking, including the fact that an individual is a victim of such violence or stalking, must be retained in confidence and may neither be entered into any shared database nor provided to any related entity, except to the extent that the disclosure

- (a) is requested or consented to by the individual in writing,
- (b) is required for use in an eviction proceeding, or
- (c) is otherwise required by applicable law.

HOUSING AUTHORITY OF THE CITY OF NORWALK GRIEVANCE PROCEDURE

Effective Date:

I. Purpose and Scope:

This Grievance Procedure is established to assure that Residents are afforded an opportunity for a hearing if the Resident disputes, within a reasonable time, any Management action or failure to act involving the Resident's lease or Management regulations which adversely affect the individual Resident's rights, duties, welfare, or status.

II. Applicability:

- A. This Grievance Procedure shall be applicable to all individual grievances as defined in paragraph III.A. below, between a Resident and Management, except as provided below.
- B. The Department of Housing and Urban Development (HUD), has issued a due process determination that the laws of the State of Connecticut provide a Resident with the opportunity for a hearing in court which provides the basic elements of due process (as defined in paragraph III.C below) before eviction from a dwelling unit. In accordance with that determination Management therefore excludes from this Grievance Procedure any Grievance concerning an eviction or termination of residency based upon:
 - 1) Any activity threatening the health, safety or the right to peaceful enjoyment of the premises of other Residents or Management employees;
 - 2) Any drug related criminal activity on or off such premises;
 - 3) Any violent criminal activity on or off the premises;
 - 4) Any activity resulting in a felony conviction; or
 - 5) Any activity exempted by HUD.
- C. This Grievance Procedure is not applicable to: (1) disputes between Residents not involving Management; (2) general policy issues; (3) class grievances; (4) discretionary administrative determinations by NHA; (5) determination of family unit size under NHA occupancy standards; or (6) the Section 8 Program. This Grievance Procedure is not intended as forum for initiating or negotiating policy changes between a group or groups of Residents and Management's Board of Commissioners.

III. Definitions:

For the purpose of this Grievance Procedure the following definitions are applicable:

- A. Grievance – “**Grievance**” means any dispute which a Resident may have with respect to Management’s action or failure to act in accordance with the individual Resident’s lease or Management’s regulations which adversely affect the individual Resident’s rights, duties, welfare or status, except as excluded in Paragraph II above, or pursuant to the applicable Code of Federal Regulations, 24 C.F.R. §966.50, *et seq.*
- B. Complainant – “**Complainant**” means any Resident whose Grievance is presented to Management in accordance with paragraphs IV and V below.
- C. Elements of Due Process – “**Elements of Due Process**” shall mean an eviction action or termination of tenancy in a State or local court in which the following procedural safeguards are required:
 - 1. Adequate notice to the Resident of the grounds for terminating the tenancy and for eviction;
 - 2. Opportunity for the Resident to examine all relevant documents, records, and regulations of Management prior to the trial for the purpose of preparing a defense;
 - 3. Right of the Resident to be represented by retained Counsel;
 - 4. Opportunity for the Resident to refute the evidence presented by Management including the right to confront and cross examine witnesses and present any affirmative legal or equitable defense which the Resident may have; and
 - 5. A decision on the merits.
- D. Resident – “**Resident**” means any lessee or the remaining head of the household of any resident family under any public housing or affordable housing lease where the Housing Authority of the City of Norwalk is the owner of such unit.
- E. Management – “**Management**” means the Housing Authority of the City of Norwalk, also referred to as the “Housing Authority”, or its Legal Counsel.
- F. Hearing Officer – “**Hearing Officer**” means person selected in accordance with paragraph V of this Grievance Procedure to hear Grievances and render a decision with respect thereto.

IV. Informal Settlement of Grievance:

Any Grievance must be personally presented, either orally or in writing, to Management's Central Management Office, within fifteen (15) days after the occurrence giving rise to the Grievance, so that the Grievance may be discussed informally and an attempt made to settle the Grievance without a hearing. Management at the time of presentation or within a reasonable period of time after presentation of the Grievance, Management shall informally discuss the Grievance with the Complainant and his or her representative, if applicable. The Complainant shall be present to discuss the informal settlement of the grievance or shall be deemed to have waived this process. Within a reasonable time after the informal discussion, a summary shall be prepared by Management, and a copy thereof shall be provided to the Complainant, and a copy retained in the Complaint's file. The summary shall be in writing and shall specify the names of the participants in the discussion, the date of the discussion, the nature of the proposed disposition of the Grievance and specific reasons therefor, and shall specify the procedure by which the Complainant may obtain a hearing if not satisfied by the proposed disposition of the Grievance.

V. Procedure to Obtain a Hearing.

- A. *A Request for Hearing* – If the Complainant is not satisfied with the results of the informal discussion, the Complainant shall submit a written request for a hearing to the Central Management Office no later than ten (10) days after the date Complainant receives the summary of the informal discussion pursuant to paragraph IV above.

The written request shall specify:

1. The reason(s) for the Grievance; and
2. The Action or relief sought.

- B. *Selection of Hearing Officer* – Grievances shall be presented before a Hearing Officer promptly selected as follows:

The Hearing Officer shall be an impartial, disinterested person appointed by the Housing Authority, other than the person who made or approved the Housing Authority action under review or a subordinate of such person. The Housing Authority may appoint any person (who may be an officer or employee of the Housing Authority) as the Hearing Officer. The Housing Authority shall consult the resident organizations before appointment of each hearing officer. Any comments or recommendations submitted by the tenant organizations shall be considered by the Housing Authority.

- C. *Failure to Request A Hearing* – If the Complainant does not request a hearing in accordance with Paragraph V.A, then Management's disposition of the Grievance under Paragraph IV shall become final; provided that failure to request a hearing shall not constitute a waiver by the Complainant of the right thereafter to contest Management's action in disposing of the Grievance in an appropriate judicial proceeding.

- D. *Hearing Prerequisite* – All Grievances shall be personally presented either orally or in writing pursuant to the informal procedure prescribed in paragraph IV as a condition precedent to a hearing under this Grievance Procedure; provided that if the Complainant shall show good cause for failing to proceed in accordance with paragraph IV to the Hearing Officer, the provisions of this paragraph V.D. may be waived by the Hearing Officer in their sole and absolute discretion.
- E. *Escrow Deposit* – Before a hearing is scheduled in any Grievance involving the amount of rent as defined in the dwelling lease which Management claims is due, the Complainant shall pay to Management an amount equal to the amount of the rent due and payable as of the first day of the month preceding the month in which the act or failure to act took place. The Complainant shall thereafter deposit the same amount of monthly rent in an escrow account monthly until the Grievance is resolved by decision of the Hearing Officer. These requirements may be waived by Management in extenuating circumstances. Unless so waived, the failure to make such escrow payments shall result in a termination of the Grievance Procedure; provided, that the failure to make the escrow payments shall not constitute a waiver of any right the Complainant may have to contest Management disposition of the Grievance in any appropriate judicial proceeding.
- F. *Scheduling of Hearings* – Upon Complainant's compliance with paragraphs V.A., V.D., and V.E. a hearing shall be scheduled by Management staff for a time and place reasonably convenient to both the Complainant and Management. A written notification, specifying the time and place of the hearing shall be delivered to the Complainant and the Hearing Officer.

VI. Procedures Governing the Hearing:

- A. The hearing shall be held before a Hearing Officer as appropriate.
- B. The Complainant shall be afforded a fair hearing, which shall include;
 - 1. The opportunity to examine before the hearing and, at the expense of the Complainant, to copy all documents, records and regulations of Management that are relevant to the hearing. Any document not so made available after request therefor by the Complainant may not be relied on by Management at the hearing;
 - 2. The right to be represented by counsel or other person chosen as a representative by the Complainant, and to have such representative make statements on the Complainant's behalf;
 - 3. The right to a private hearing unless the Complainant requests a public hearing;
 - 4. The right to present evidence and arguments in support of the Complainant's complaint, to present legal and/or equitable defenses, to controvert the evidence relied on by Management and to confront and cross-examine all witnesses on whose testimony or information Management relies; and
 - 5. A decision based solely and exclusively upon the facts presented at the hearing.

- C. The Hearing officer may render a decision without proceeding with the hearing if the Hearing Officer determines that the issue has been previously decided in another proceeding.
- D. If the Complainant or Management fails to appear in person at a scheduled hearing, the Hearing Officer may make a determination to postpone the hearing for a period not to exceed ten (10) business days or to another date agreeable to both parties or make a determination that the party has waived the right to a hearing. Both the Complainant and Management shall be notified of the determination by the Hearing Officer. The determination shall not constitute a waiver of any right the Complainant may have to contest disposition of the Grievance in an appropriate judicial proceeding.
- E. At the hearing, the Complainant must first make a showing of an entitlement to the relief sought and thereafter Management must sustain the burden of justifying Management action or failure to act against which the Grievance is described.
- F. The hearing shall be conducted informally by the Hearing Officer and oral or documentary evidence pertinent to the facts and issues raised by the Grievance maybe received without regard to admissibility under the rules of evidence applicable to judicial proceedings. The Hearing Officer shall require Management, the Complainant, counsel and other participants or spectators to conduct themselves in an orderly fashion. Failure to comply with the directions of the Hearing Officer to obtain order may result in exclusion from the proceedings or in a decision adverse to the interests of the disorderly party and granting or denial of the relief sought as appropriate.
- G. Management may record the hearing but shall not be required to prepare a transcript of the hearing. The Complainant or Management may arrange, at the expense of the party making the arrangement, for a transcript of the hearing. Any interested party may purchase a copy of such transcript.

VII. Decision of the Hearing Officer:

- A. The Hearing Officer shall prepare a written decision, together with the reasons therefore, within a reasonable time after the hearing. A copy of the decision shall be sent to the Complainant and Management which shall retain a copy of the decision in the Resident's folder. A copy of such decision, with all names and identifying references deleted, shall also be maintained on file by Management and made available for inspection by a prospective Complainant, his or her representative, or Hearing Officer.
- B. The decision of the Hearing Officer shall be binding on Management, which shall take all actions or refrain from any actions necessary to carry out the decision unless Management's Board of Commissioners has determined within sixty (60) business days after the date of the decision and promptly notified the Complainant of its determination that:

1. The Grievance does not concern Authority action or failure to act in accordance with or involving the Complainant's lease or Management regulations, which adversely affect the Complainant's rights, duties, welfare or status.
 2. The decision of the Hearing Officer is contrary to applicable Federal, State or local law, HUD regulations or requirements of the Annual Contributions Contract between HUD and Management.
- C. A decision by the hearing Officer or Board of Commissioners in favor of Management or which denies the relief requested by the Complainant in whole or in part shall not constitute a waiver of, nor affect in any manner whatever, any rights the Complainant may have to a trial de novo or judicial review in any judicial proceedings, which may thereafter be brought in the matter

VIII. Management Eviction Action:

If a Resident has requested a hearing in accordance with paragraph V on a Grievance involving a Management Notice of Termination of Tenancy (Pretermination Notice), Management may issue a notice to quit and/or summary process summons and complaint but shall not seek judicial adjudication of the matter until the grievance process has been terminated, i.e. the Hearing Officer issues its decision in the matter.

IX. Accommodation of Persons with Disabilities:

- A. *Accommodations of Persons Disabilities* – Management provides reasonable accommodation for persons with disabilities to participate in the hearing. Reasonable accommodation may include qualified sign language interpreters, readers, accessible locations or attendants. If the Complainant is visually impaired, any notice to the Complainant which is required under this Grievance Procedure shall be in accessible format if management has been so notified.

Curtis O. Law, Executive Director

Pet Policy

In accordance with Section 31 of the United States Housing Act of 1937, pet ownership is permitted by residents of Public Housing subject to compliance with reasonable requirements established by the public housing agency. This subpart is intended for residents of public housing.

FAMILY COMPLEXES

The following are deemed allowable pets:

- One fish tank no larger than 25 gallons.
- Two birds, that are no larger than 8 inches long as an adult, kept in cage(s).

SENIOR COMPLEXES

The following are deemed allowable pets:

- One cat or one dog that is spayed or neutered and has all veterinarian shots. Relative documentation must be provided at the time of admission or recertification or before obtaining a dog. The size limit for dogs is 40 pounds and no higher than 25 inches from the ground to the top of the head when standing.
- One fish tank no larger than 25 gallons.
- Two birds, that are no larger than 8 inches long as an adult, kept in cage(s).

Residents wishing to have one or more such pets shall complete a pet application, filled out by the Head of Household and returned to their perspective Occupancy Specialist.

NOTE: All requirements must be met prior to pet moving into unit. This policy is for all residents of the Norwalk Housing Authority but it does not apply to assistance service animals (these are not considered pets).

To ensure the peaceful enjoyment of all residents the Housing Authority of the City of Norwalk (NHA), has established the following pet ownership requirements.

- maintain pet(s) responsibly,
- keep dogs inside of unit or on a leash at all times when outside and clean up after them immediately,
- no visiting pets are allowed,
- extermination services are required for pet owners,
- control noise and odor caused by pet,
- if a dog bites anyone, the owner will be required to get rid of the pet,
- pets are not allowed in common areas such as lobby, laundry room, etc.
- family is responsible to keep each pet, in accordance with applicable state and local public health, animal control and animal cruelty laws and regulations,
- provide NHA with a contact person who would be responsible for pet if owner is unable to due to unexpected absence from unit, (next of kin) or give NHA permission to remove:

Name of contact person: _____

Address: _____

Phone Number: _____

NHA will issue up to 3 warnings and charge pet owner for any violations, as per our standard housing authority maintenance charges. NHA will issue a written notice for the pet removal, if the pet owner violates a rule governing the owning or keeping of pets. The notice shall give the pet owner 10 calendar days for pet removal. Failure to comply may result in initiation of procedures to terminate the pet owner's tenancy.

HOUSING AUTHORITY OF THE CITY OF NORWALK
FAMILY SELF SUFFICIENCY PROGRAM
ACTION PLAN

PROPOSED 09/19/2011

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**HOUSING AUTHORITY OF THE CITY OF NORWALK
FAMILY SELF SUFFICIENCY PROGRAM ACTION PLAN**

1. Purpose

The purpose of the Family Self-Sufficiency (FSS) program is to promote the development of local strategies to coordinate the use of Department of Housing and Urban Development (HUD) income base Public Housing rental units and Section 8 rental assistance program with public and private resources to enable families eligible to receive assistance under these programs to achieve economic independence and self-sufficiency. The FSS program and this FSS Action Plan support HUD's strategic goal of helping HUD assisted renters to make progress towards self-sufficiency.

2. Program objective

The objective of the Family Self-Sufficiency (FSS) program is to reduce the dependency of low-income families on welfare assistance, and other Federal, State and local subsidies. The FSS program provides critical tools that can be used to support welfare reform and helps families in our community to develop new skills that will lead to economic self-sufficiency. Specific objectives include:

- Developing local strategies that coordinate local resources to deliver effective services that support low-income families in achieving economic independence.
- Stabilizing housing assistance and providing escrow accounts for participating families to allow them to make a transition to private and unsubsidized market housing.

3. Demographics and estimate of participating families

The FSS program provides services to eligible families who are currently receiving housing assistance through the City of Norwalk Housing Authority Public Housing programs, as per HUD guidelines. The following represents the demographics of potential FSS program participants based upon the total number of Federal Housing residents and Section 8 participants as of September 12, 2011:

	Non-Hispanic		Hispanic
Caucasian:	PH	70%	30%
	Sec. 8	79%	21%
Black or African-American:	PH	56%	0%
	Sec. 8	55%	0%
Native American or Alaskan Native:	PH	.1%	0%
	Sec. 8	.2%	0%
Asian:	PH	.3%	0%
	Sec. 8	.4%	0%

Native Hawaiian or Pacific Islander:	0%	0%
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NHA provides subsidized public housing for 293 elderly units and 560 family units. NHA will maintain a combined mandatory/voluntary program size of up to 30 slots. Section 8 currently has a program of 680 vouchers. Section 8 program will maintain a combined mandatory/voluntary program size of up to 75 slots. NHA maintains the right to adjust the voluntary program size as necessary, and may expand as necessary to accommodate growing interest in the program as funds are available.

5. Family selection procedures

It is the policy of NHA to comply with all Federal, state, and local nondiscrimination laws; the Americans with Disabilities Act; and the U.S. Department of Housing and Urban Development regulations governing Fair Housing and Equal Opportunity. No person shall be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under the FSS program on the ground of age, race, color, sex, religion, national or ethnic origin, familial status, sexual status, source of income, or physical or mental handicap. In addition, NHA FSS staff will, upon request, provide reasonable accommodation to persons with disabilities to ensure they are able to take advantage of the services provided by the FSS program.

To be eligible for the Family Self-Sufficiency program, clients who express an interest in the FSS program will be screened before being enrolled in the program within the following HUD allowable guidelines: mandatory participation in an FSS program orientation on an individual basis. The orientation will include a review of participant expectations, the services offered, and the requirements to complete the FSS program. NHA believes motivated families are key to ensuring the family's success. Acceptance screening must be strictly based upon motivation and interest in the program. Those interested clients who have successfully completed the orientation and express further interest will be required to meet the following criteria prior to signing the FSS Contract of Participation:

1. For the Federal Public Housing FSS program, an applicant must be a current Federal Public Housing resident and in good standing (applicant must not be delinquent in housing debt repayment agreement, must not owe money to another Public Housing Authority and must not have a stipulated judgment).
2. Participants shall submit a completed pre-enrollment application and needs assessment forms.
3. The head of household must develop and agree to follow an Individual Training and Services Plan with the goal of obtaining suitable employment. Other adult family members eligible for housing assistance (eighteen years of age or older) may also choose to complete an ITSP.

4. It is often important that participants have knowledge of the English language for employment opportunities. Participants with limited English language skills will be strongly encouraged to complete English as a Second Language (ESL) classes.
5. Participants shall demonstrate commitment by keeping all scheduled appointments or rarely rescheduling in advance.
6. Previous FSS participants will not be afforded a second opportunity for re-enrollment in the program if they have been previously terminated from the program, unless there are extenuating circumstances (i.e. illness, loss of employment, etc.). In such cases a prior participant may re-apply and the decision will be made on a case-by-case basis.

6. Application process and participant responsibilities

Once a family has gone through the family selection procedures and meets all requirements, the FSS Coordinator will review all available information concerning family composition, income, service needs and any other relevant factors. The head of household responsibilities include, but are not limited to, the following requirements:

1. The head of the FSS family shall be required under the Contract of Participation to seek and maintain suitable employment during the term of the contract and any extension thereof. Although other members of the FSS family may seek and maintain employment during the term of the contract, only the head of the FSS family is required to seek and maintain suitable employment in order for the family to be eligible for completion of the FSS Contract of Participation.
2. The obligation to seek employment means that the head of the FSS family has applied for employment, attended job interviews, and has otherwise followed through on employment opportunities. The head of the FSS family may also be considered in compliance with the employment requirement if participating in educational and/or training programs full-time or part-time in tandem with part-time employment. A determination of suitable employment shall be made by the NHA based on skills, education, and job training of the individual that has been designated the head of the FSS family, and based on the available job opportunities within the jurisdiction served by the NHA.
3. Unemployed or under employed participants may be assisted and/or referred to state and local job development programs. Local workforce development programs can provide intensive jobs search assistance, job search workshops and further referral to workforce development programs such as training, work experience and on-the-job training activities. Participation in such activities must be reported to the FSS Coordinator.
4. Participants are required to attend a minimum of two (2) workshops per year based on identified needs, goals and to enhance knowledge and experience to gain opportunity to advance in self sufficiency. These workshops can include NHA workshops as well as training opportunities offered by other service providers.

Documentation for completion of workshop activities must be submitted to the FSS Coordinator.

5. Participants will be required to maintain documentation which includes their Contract of Participation, program information, objectives and a record of their achievement (i.e. workshops, educational certificates, training certifications, etc.). The FSS participant is responsible for providing a copy of these accomplishments to the FSS Coordinator.
6. Participants shall complete activities within the dates listed in each ITSP.
7. The family must develop a written plan for the use of available funds at least two (2) years prior to graduation. The participant is encouraged to invest their final disbursement in area that continues to increase the family's self-sufficiency for example: education, job training, transportation, homeownership, furthering employment and career advancement.

The FSS Coordinator, in conjunction with the family, begins to complete the ITSP and the Contract of Participation. At this stage, immediate barriers, goals, service and agencies to provide services will be identified. The ITSP and the written plan for the use of available funds when developed will be review and updated, at a minimum, on an annual basis. At that time the participant's progress will be reviewed and the plan will be modified as needed.

7. Incentive to encourage participation

In order to encourage participation, information regarding the establishment of a FSS escrow account will be made available through agency mailings and/or other outreach opportunities until all initial slots are filled. One-on-one meetings with each prospective FSS participant requesting such a meeting will also serve as a source of information.

8. Outreach efforts

NHA will recruit potential FSS participants through a variety of modes to ensure that eligible families are aware of the opportunities available through the FSS program. Recruiting activities will include, but are not limited to: mailing informational brochures to all Public Housing residents; including FSS information in Norwalk Housing Authority publications, providing informational brochures at the central office, providing information on the NHA website, at NHA workshops, open houses or other opportunities.

9. Activities and supportive services

During the term of the Family Self-Sufficiency Contract of participation, NHA will refer participants to the following resources and services in collaboration with other area providers. The following providers include, but are not limited to:

1. Childcare -- Norwalk Economic Opportunity Now, Inc.

2. Education -- Norwalk Community College and Norwalk Board of Education
3. Job training and employment -- Norwalk Economic Opportunity Now, Inc., and Connecticut Works
4. Substance abuse treatment and counseling -- Family Children's Agency and Connecticut Counseling Center
5. Household management and parenting training -- Norwalk Housing Authority, Norwalk Economic Opportunity Now, Inc., and Family & Children's Agency
6. Money management -- Money Management International, Inc.
7. Homeownership counseling -- Money Management International, Inc. & The Housing Development Fund.

10. Program termination

The FSS Contract of Participation will be terminated before the expiration of the contract term, and any extension thereof, for the following reasons:

1. The Contract of Participation is automatically terminated if the family's Public Housing assistance or Section 8 Voucher is terminated in accordance with HUD requirements;
2. If the family violates family housing obligations. A participant family's housing obligations are described in the Certificate of Family Participation/Lease Agreement.
3. If the family breaches the FSS contract. The family's obligations for the FSS program are described in FSS Contract of Participation, HUD form 52650.
4. If the FSS family's head of household fails to become independent from welfare assistance one year prior to end of contract date.
5. If the FSS family's head of household fails to meet the employment obligation per the contract, prior to the end of contract date.
6. The family withdraws from the FSS program or the FSS participant and NHA sign a written agreement mutually agreeing to terminate the contract.
7. NHA determines that the resources and services necessary to complete the contract are not available.
8. Participants who are unable to fulfill the terms of the contract due to illness, may submit a request for withdrawal from the program. If the participant is unable to complete the request for withdrawal, the FSS Coordinator may complete the request for withdrawal on behalf of the participant.
9. Any related new HUD mandate resulting in changes to the contract of participation and/or the related CFR.
10. Such other act as is deemed inconsistent with the purpose of the FSS program or operation of law.

11. Involuntary termination

NHA encourages FSS participants to take full advantage of programs and services available to advance their self-sufficiency, as funding for the FSS program is limited and participant enrollment is capped. Participants may be denied or involuntarily terminated from FSS program under the following circumstances: If the participant fails to meet their obligations under the Contract of Participation, the ITSP, the Program Completion Agreement and related documentation. Non-compliance includes:

1. Repeatedly missing scheduled meetings and not rescheduling within 2 weeks.
2. Repeated failure to return phone calls.
3. Failure to maintain and complete quarterly face-to-face or telephone reviews.
4. Failure to work on activities and/or goals set forth in the ITSP.
5. Failure to consistently complete the activities within the targeted dates listed in the ITSP. (Participant will be evaluated at the end of the first six months and at the end of the first year of the initial start date to evaluate participant performance and willingness to continue to work on goals and activities listed in the ITSP).
6. Failure to participate in job related activities (i.e. employment, education, training, workshops, completing applications, etc.)
7. If the participant has committed fraud in connection with any Federal housing assistance program.
8. If the participant failed to meet any obligation under the lease.
9. If the client's housing assistance is terminated.
10. By operation of law; and/or
11. By such other act as is deemed inconsistent with the FSS program.

12. Termination procedures for removing non-compliant participants from the FSS program

If a household is terminated from the FSS program, the following steps will be taken prior to terminating assistance:

1. 1st letter of non-compliance (Informal Meeting)
2. 2nd letter of non-compliance (Informal Meeting)
3. 3rd letter of termination (Formal Hearing)

For the informal meetings, the first letter of non-compliance will be sent to the FSS participant. The FSS participant will have ten (10) business days to respond to the letter. If the participant does not respond, the second letter of non-compliance will be sent out. If the participant does not respond within ten (10) business days of the second letter, the third letter of termination will be sent out.

The first and second informal meetings will include the FSS participant and the FSS Coordinator. The FSS Coordinator will consider the reasons for non-compliance, including the opportunity to redesign the ITSP for the FSS participant.

If after two (2) informal meetings the FSS participant continues to be non-compliant, the third letter of termination will be sent out. The FSS participant has ten (10) business days to request a formal hearing. A formal hearing will be conducted under NHA guidelines for tenant hearings, in accordance with NHA grievance procedures. The meeting will include the FSS participant, the FSS Coordinator and the Director of Housing Operations. If the FSS Coordinator does not receive a writing request after the ten (10) days, the FSS participant will be terminated from the FSS Program.

Failure to request a hearing in writing by the deadline will result in closure of the Family's FSS file and all rights to a hearing will be waived. All escrow money held on the family's behalf will be forfeited in accordance with HUD regulations. Housing assistance will not be terminated based on non-compliance with the FSS program.

13. Assurance of non-interference with rights of non-participating families

A family's election not to participate in the FSS program will not affect the family's admission to public housing or to the Section 8 program or to the family's right to occupancy in accordance with its lease. NHA will include materials in the literature mailed to all Public Housing families and during Public Housing orientations ensuring that a family's election not to participate in the FSS program will not affect the family's admission to the Public Housing program. The Public Housing Office will also give information to families at the time they are admitted to Public Housing and at annual recertification

14. Certification and coordination

NHA will coordinate public and private resources in order to meet the needs of FSS Participants.

Program Coordinating Committee (PCC)

NHA FSS Program Coordinating Committee Partners	
Partners	Area of Specialization
Family & Children's Agency, Inc.	Youth development, Family strengthening, Behavioral health, service for senior
Norwalk Community College	Education
University of Phoenix (Norwalk campus)	Education
Money Management International	Financial education, Homeownership

	training
Norwalk Economic Opportunity Now, Inc.	Childcare, job training, basic adult skill, GED
Norwalk Community Health Center	Health
NHA Staff	Public Housing, FSS Coordinator
NHA Staff	Director of Housing Operation
Literacy Volunteers	ESL, computer training
McCue Mortgage	Homeownership, financial education
Housing Development Fund	Homeownership, housing counselors
Realtor	Homeownership
Public Housing resident	Resident
Career Resources	Job development programs and career opportunities
Women's Center	Improvement of psychological, career, financial and legal well-being of women and families.
Norwalk Health Department	Health

15. Request for reasonable accommodations

NHA and the FSS program staff will make reasonable accommodations to persons with disabilities in order to ensure they are able to take full advantage of the services provided under the FSS program. Request for reasonable accommodations must be submitted in writing to Personnel Analyst, NHA 504 Compliance Officer. For more information, call (203) 838-8471 x137

16. Portability

The NHA is not obligated to accept incoming portable FSS participants into the FSS program. Acceptance of incoming portable clients into the NHA FSS program is entirely at the discretion of the NHA. It is the responsibility of all FSS families exercising portability into jurisdiction of the NHA to notify the NHA of their status in the FSS program. It is the responsibility of all FSS families exercising portability into the jurisdiction of the NHA to notify the NHA of their status in the FSS program. Families that notify the NHA of their FSS status within ninety (90) days of the effective date of their lease up in the NHA jurisdiction will be given priority. If the NHA accepts the family into the FSS program, the NHA will execute a new FSS Contract of Participation.

Procedures:

1. The NHA will contact the initial Housing Authority to request a copy of the family's Contract of Participation and to request transfer of any escrow funds if the family's certificate or voucher is absorbed.

2. Incoming portable FSS families with current FSS contracts will be given priority on the waiting list for a slot in the NHA FSS program if they contact the FSS Coordinator within ninety (90) days of the effective date of their lease up in the NHA jurisdiction. After ninety (90) days, the family will be placed on the waiting list as of the date the family notified the NHA of its FSS status.
3. Incoming portable families must complete a NHA FSS application and any assessment or assignments necessary to complete an ITSP, prior to signing a FSS Contract of Participation.
4. Incoming portable FSS families will not begin to receive escrow credits from the NHA until the effective date of the FSS Contract of Participation executed by the NHA.
5. Incoming portable families whose vouchers are not absorbed may continue in the FSS program of the initial Housing Authority, if the initial Housing Authority is willing to maintain the Contract of Participation and the FSS escrow account. If the voucher is absorbed at a later date, the family must execute a new FSS Contract of Participation with the receiving Housing Authority or be terminated from the FSS program.

17. Outgoing Portables

It is the responsibility of the FSS family to inform the receiving Housing Authority of its FSS status and to contact the FSS Coordinator at the receiving Housing Authority.

Procedures:

1. The NHA will make a good faith effort to locate and contact, a FSS family that exercises portability to another jurisdiction. If the family does not respond within thirty (30) days, the NHA may terminate the family's FSS contract. If the contract is terminated, the family's escrow will be forfeited.
2. The NHA will notify the receiving Housing Authority that the family has an active FSS Contract of Participation and an escrow account, if applicable.
3. If the family's voucher is absorbed by the receiving housing authority and the family is accepted into the receiving Housing Authority's FSS program, the contract and escrow account funds will be transferred to the receiving Housing Authority.
4. If the family's voucher is not absorbed by the receiving Housing Authority, and if the family can demonstrate that it can fulfill its responsibilities under the FSS contract in the new location the NHA may allow the family to continue in the NHA's FSS program. In this case, the family must relocate to a jurisdiction within fifty miles of the NHA to ensure the NHA can adequately oversee the family's participation in the program.

18. Denial of participation in FSS

NHA will deny participation in the FSS program to a family that does not meet the requirements of the family selection procedures described above. Families denied participation in the FSS program may request an Informal Hearing to determine whether the decision was made in accordance with HUD regulations and the guidelines in this plan. The request for an Informal Hearing must be made in writing within ten (10) working days of the date of notification of the decision to deny participation.

19. Method of identifying family needs

An initial family profile and intake form will be given to each FSS participant in order to identify the needs of the family. Completion of the questionnaire will allow the FSS Coordinator to obtain the information necessary for assessing the needs of each family so that the appropriate referrals can be made on behalf of the family.

20. Lack of essential services

If a social service agency cannot deliver the supportive services under the FSS family member's ITSP, NHA shall make a good faith effort to obtain these services from another agency. If NHA is unable to obtain the services from another agency, NHA shall reassess the family member's needs, and determine whether other available services would achieve the same purpose. If other available services would not achieve the same purpose, NHA shall determine whether the unavailable services are integral to the FSS family's advancement or progress toward self-sufficiency.

If the unavailable services are determined not be to integral to the FSS family's advancement toward self-sufficiency, NHA shall revise the ITSP to delete these services, and modify the contract of participation to remove any obligation on the part of the FSS family to accept the unavailable services. If the unavailable services are determined to be integral to the FSS family's advancement toward self-sufficiency, NHA shall declare the contract of participation null and void.

21. Modification to the Contract

NHA and the FSS family may mutually agree to modify the contract of participation. The Contract of Participation may be modified in writing with respect to the ITSP, the contract term (extension), and designation of the head of the family. Modifications to the ITSP may be made no later than six (6) months prior to the expiration date of the FSS Contract of Participation.

22. Change in head of household

The FSS head of household is the head of household designated on the family's housing assistance for purposes of rent determination. The head of household is responsible for the requirements under the Contract of Participation, ITSP, Program Completion Agreement, and other related documentation. If the family wishes to transfer head of household status, it can only be made with the permission of the Occupancy Specialist and only to an adult member of the household who is listed on the family's lease/rental agreement. This person must also elect to assume all of the responsibilities, conditions, and terms as the FSS head of household listed in the Contract of Participation, ITSP, Program Completion Agreement, and other related documentation.

A written request must be submitted to the FSS Coordinator and will be attached to the Contract of Participation as an amendment. The request must contain the following:

1. Name of new designated head of household
2. Effective date of change
3. Signature of new head of household
4. Signature of the FSS case manager; and
5. The date signed.

The new head of household will be required to develop their own ITSP. The contract expiration date and baseline income and TTP figures will remain unchanged.

23. Contract extensions

NHA may, in writing, extend the term of the Contract of Participation for a period not to exceed two years when good cause exists for granting an extension. Examples of such good cause include a serious illness or involuntary loss of employment for the head of household or additional time needed for a family to get off Temporary Assistance for Needy Family (TANF) assistance. A family must supply a written request for an extension that includes a description of the need for the extension, as well as the reason that was "beyond their control" no later than thirty (30) calendar days prior to the expiration date of the FSS Contract of Participation. In this written request, the applicant must include a description and estimated time to complete the tasks necessary to reach the final goal. Requests for an extension shall not be approved unless circumstances beyond the control of the FSS family are evident in the need for extension. The PHA staff person responsible for the administration of the FSS program will review extension requests. All extensions require approval of the NHA Family Self-Sufficiency Manager and/or Director of Housing Operations. NHA retains the sole discretion to grant or deny an extension request.

Families denied contract extensions may request an informal hearing to determine whether the decision was made in accordance with HUD regulations and the guidelines in this plan.

The request for an informal hearing must be made in writing within ten (10) business days of the date of notification of the decision to deny the extension.

24. Requirements for successful completion of the contract of participation

The contract will be successfully completed when NHA determines that the family has fulfilled all of its responsibilities under the contract; or, thirty percent (30%) of the family's monthly adjusted income equals or exceeds the Fair Market Rent (FMR) in effect at the time for the unit size for which the family qualifies.

25. Maintenance of escrow accounts

The NHA will establish FSS escrow accounts for FSS participants whose portion of the rent increases due to an increase in their earned income. The escrow funds will be deposited in an interest-bearing account. Escrow credits will be deposited to the FSS account in accordance with HUD regulations.

26. Calculation of escrow

FSS escrow credits will be calculated monthly and in accordance with HUD regulations. Interest on the FSS escrow account balances will be allocated yearly.

27. Escrow reports to families

Escrow account reports will be sent to each FSS family at least once annually. The report will include the escrow balance at the beginning of the reporting period, the amount of the family's escrow credits for the period, any deductions made from the account for the period, the amount of interest earned for the period, and the total balance in the account at the end of the reporting period.

28. Interim withdrawal procedure

Participants in good standing with the FSS program and NHA will be allowed to request money from their escrow accounts prior to the completion of their contract. The early withdrawal of funds must be used for continuing growth and for reaching the goals articulated in the ITSP. The family will be required to contribute a maximum of 20% of the overall cost of the item. All FSS families with an escrow balance are eligible to request a withdrawal.

Interim disbursements will be made at the discretion of NHA under the following conditions:

1. The funds are needed to complete goals in the ITSP for the following:

- A) Pay for school tuition or other school costs
 - B) Job training expenses
 - C) Business start-up expenses
 - D) Auto repair expenses or purchases
 - E) Homeownership (1% down payment assistance, Home Insurance, and Property inspection fee)
2. The family can demonstrate progress towards completion or completion of interim goals from its ITSP.
 3. Interim disbursement may be granted for no more than 50% of escrow funds over a one year period of the family's escrow balance at the time of the request.
Exceptions include:
 - A) The purchase of a home
 - B) Post-secondary degree or certificate credit program from accredited colleges or universities which may lead to employment and/or career advancement.
 4. Interim escrow disbursement will be paid in the form of a check made payable directly to the agency, business, or individual providing the required items of service.
 5. Participant must be engaged in regular case management.

The FSS participant must submit a written request must include:

1. The amount of money requested
2. The amount of money the family will be investing
3. How the funds will be used
4. How this will facilitate their movement toward self-sufficiency
5. An assessment including proof of their progress on their self-sufficiency goals
6. Alternative funding sources researched
7. Documentation of expenses.

The FSS Coordinator will discuss the appropriateness of the request as needed with NHA management. The FSS program reserves the right to request that the family attend a meeting for clarification of the withdrawal request before a determination is made and/or require additional documentation prior to making a decision.

29. Forfeiture of the escrow funds

A participating family has no right to any funds from its FSS escrow account if:

1. The Contract of Participation, including any extension, expires and the obligations are unfulfilled.
2. The Contract of Participation including any extension thereof is completed by the family but the FSS family is still receiving welfare assistance.
3. The FSS family loses their housing assistance.

4. The FSS family is deemed to be out of compliance with the FSS program and is terminated; and or
5. The FSS family voluntarily terminates their enrollment in the FSS program.
6. The head of the family dies and the remaining members of the family choose not to continue participating in the program and the contract obligations have not been met.
7. If any member of the family does not meet his or her responsibilities under the ITSP contract, including compliance of the terms of NHA's lease, the family will not receive the money in its FSS escrow account.

30. Final withdrawal procedure

The participating family will receive a disbursement of its escrow funds upon successful completion of the Contract of Participation. The FSS Coordinator and NHA management responsible for the administration of the FSS program will review final disbursement requests.

Upon determination of successful graduation from the FSS program, the family will receive a disbursement of the funds accumulated in its escrow account under the following conditions:

1. The family has met the obligations as defined in the Contract of Participation (i.e. demonstrate that all interim and final goals were completed on or before the expiration date of the contract.
2. Whenever 30% of the family's monthly adjusted income equals or exceeds the existing Fair Market Rent for the unit size for which the family qualifies.
3. Any money owed to the NHA will be withheld from the total escrow amount before disbursement.
4. The family must submit verification that all household members are independent of welfare assistance (i.e. any Federal or State TANF assistance) for the last year prior to graduation.
5. The head of household must provide verification of suitable employment.

31. Denial of graduation

If the PHA determines that a participant did not successfully graduate from the FSS program, the participant may request an formal hearing to determine whether the decision to deny graduation was made in accordance with HUD regulations and the guidelines in this plan. A request for an informal hearing must be made in writing within ten (10) calendar days of the date of NHA's notification of the decision to deny graduation from the FSS program. If NHA determines the family did not successfully graduate from the FSS program, the family will forfeit the funds in its FSS escrow account.